

# **United States v. Andrade**

## **Defendant's Sentencing Memorandum**

### **ATTACHMENT-2**

**Deposition of:**

Brandi Jodoin

**Case:**

NAC Foundation, LLC v. Corey Jodoin, et al.  
A-18-770594-C

**Date:**

04/03/2020



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<p>1 DISTRICT COURT</p> <p>2 CLARK COUNTY, NEVADA</p> <p>3 * * * * *</p> <p>4</p> <p>5 NAC FOUNDATION, LLC, a Nevada</p> <p>6 limited liability company,</p> <p>7 Plaintiff,</p> <p>8 vs. Case No. A-18-770594-C</p> <p>9 COREY JODOIN, individually;</p> <p>10 BRANDI JODOIN, individually;</p> <p>11 DOES 1 through 10; and ROE</p> <p>12 CORPORATIONS 1 through 10,</p> <p>13 Defendants.</p> <p>14</p> <p>15</p> <p>16 REMOTE VIDEOCONFERENCE DEPOSITION OF BRANDI JODOIN</p> <p>17 Taken on April 3, 2020</p> <p>18 At 1:05 p.m.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23 Reported by: Kimberly A. Farkas, RPR, CCR #741</p> <p>24 Job No. 40110</p> <p>25</p>	<p>1 DEPOSITION OF BRANDI JODOIN</p> <p>2 April 3, 2020</p> <p>3 Kimberly A. Farkas, CCR No. 741</p> <p>4 * * * * *</p> <p>5</p> <p>6 INDEX</p> <p>7 Page</p> <p>8 BRANDI JODOIN</p> <p>9 Examination by Mr. Olsen 5</p> <p>10 * * * * *</p> <p>11</p> <p>12 EXHIBITS</p> <p>13 No. Description Page</p> <p>14 Exhibit 1 Packet of Documents 4</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 Remote Videoconference Deposition of BRANDI</p> <p>2 JODOIN, taken on Friday, April 3, 2020, at 1:05 p.m.,</p> <p>3 before Kimberly A. Farkas, Certified Court Reporter in</p> <p>4 and for the State of Nevada.</p> <p>5</p> <p>6 APPEARANCES</p> <p>7</p> <p>8 For the Plaintiffs:</p> <p>9</p> <p>10 ERIC R. OLSEN, ESQ.</p> <p>11 Garman Turner Gordon, LLP</p> <p>12 7251 Amigo Street, Suite 210</p> <p>13 Las Vegas, Nevada 89119</p> <p>14 (725) 777-3000</p> <p>15</p> <p>16 For the Defendants:</p> <p>17</p> <p>18 ADAM R. KNECHT, ESQ.</p> <p>19 Alverson Taylor &amp; Sanders</p> <p>20 6605 Grand Montecito Parkway, Suite 200</p> <p>21 Las Vegas, Nevada 89149</p> <p>22 (702) 384-7000</p> <p>23</p> <p>24 Also present: Corey Jodoin</p> <p>25</p>	<p>1 Friday, April 3, 2020</p> <p>2 1:05 p.m.</p> <p>3 DEPOSITION OF BRANDI JODOIN</p> <p>4 * * * * *</p> <p>5 (Exhibit No. 1 was marked prior to</p> <p>6 commencement of the deposition.)</p> <p>7 THE STENOGRAPHER: Good afternoon. My name</p> <p>8 is Kim Farkas. I am a Nevada certified stenographic</p> <p>9 reporter. My CSR number is 741. Today's date is</p> <p>10 April 3, 2020. The time is approximately 1:05 p.m.</p> <p>11 This is the deposition of Brandi Jodoin in</p> <p>12 the matter of NAC Foundation versus Corey Jodoin, et</p> <p>13 al. This case is venued in the District Court of the</p> <p>14 State of Nevada for the County of Clark. The case</p> <p>15 number is A-18-770594-C.</p> <p>16 At this time, I will ask counsel to identify</p> <p>17 yourselves, state whom you represent, and agree on the</p> <p>18 record that there is no objection to this deposition</p> <p>19 officer administering a binding oath to the witness</p> <p>20 through Zoom.</p> <p>21 Let's start with the noticing attorney.</p> <p>22 MR. OLSEN: This is Eric Olsen representing</p> <p>23 the plaintiff, NAC Foundation, LLC. I have no</p> <p>24 objection. By the way, I was expecting my client to</p> <p>25 join at some point. He may join in, but he's not</p>

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<p>1 gotten onto the record yet here. But I have no                  2 objection.                  3 MR. KNECHT: This is Adam Knecht. I                  4 represent Brandi Jodoin. I have no objection. I also                  5 represent Corey Jodoin who is listening in right now                  6 with Brandi.                  7 BRANDI JODOIN,                  8 having been first duly sworn, was examined and                  9 testified as follows:                  10 EXAMINATION                  11 BY MR. OLSEN:                  12 Q. So I'm glad that we got clarification on the                  13 pronunciation of the name. I know that Mr. Knecht and                  14 I have both butchered it over the years, but it is                  15 Jodoin, as I understand?                  16 A. Yes, that's correct.                  17 Q. Mrs. Jodoin, have you been deposed before?                  18 A. No, I have not.                  19 Q. Well, then let me go through a few of the                  20 ground rules to make sure that we are all on the same                  21 page. Pardon me. You've been placed under oath and                  22 that is the same type of oath you would be under in a                  23 court of law. Do you understand that?                  24 A. Yes, I do.                  25 Q. It is, therefore, your obligation to answer</p>	<p>1 official record, for this deposition, although the                  2 video may be used.                  3 "Uh-huh" and "huh-uh," those kinds of                  4 answers, are also not good because it's really, again,                  5 difficult to decipher your meaning. So if there's a                  6 yes or no question, then please answer yes or no.                  7 Everything that is being taken down will be                  8 put into booklet form. You'll have an opportunity to                  9 review that at some point, the transcript, and make                  10 changes if you wish to correct something. But I will                  11 tell you that if you do make changes, I'm able to                  12 comment on those changes, the fact they were made, at a                  13 later time, for example, if we're in a trial situation.                  14 Do you have any questions about the process                  15 today?                  16 A. No. I believe it's clear.                  17 Q. Okay. Let me ask you, first of all, I think                  18 we have your name as Brandi, B-R-A-N-D-I, Jodoin;                  19 correct?                  20 A. That's correct.                  21 Q. Can you tell me what other names you've gone                  22 by? Do you have a maiden name, for example?                  23 A. My maiden name is Ortmeier, O-R-T-M-E-I-E-R.                  24 Q. Okay. And are you a U.S. citizen?                  25 A. Yes, I am.</p>
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<p>1 the questions that I pose today truthfully and to the                  2 best of your ability. Do you understand that?                  3 A. Yes, I do.                  4 Q. To that heed, it's important that you                  5 understand the question. So if there are questions                  6 that you do not understand, just let me know that and                  7 I'll try to rephrase the questions. It's also                  8 important that we don't -- especially in this                  9 particular format -- that we do not speak over each                  10 other. So let me finish my question before you give                  11 your answer.                  12 Your lawyer may also interpose an objection.                  13 In most cases, the objection will be interposed, and                  14 then you'll be asked to go ahead and answer the                  15 question. There may be certain instances where the                  16 objection is one made to an attorney/client privileged                  17 communication. In that case, your lawyer may instruct                  18 you not to answer. But once the objections have been                  19 resolved or made and resolved, then you'll be, in most                  20 cases, asked to go ahead and respond.                  21 Do not -- despite the fact we're on video,                  22 the transcript is being taken down in writing so it's                  23 important that you avoid nodding your head, shaking                  24 your head, in response to questions. That's very                  25 difficult to pick up on paper, which is the record,</p>	<p>1 Q. Are you a dual citizen in Canada?                  2 A. No, I am not.                  3 Q. So you're a resident, permanent resident,                  4 status in Canada?                  5 A. Yes, that is correct.                  6 Q. Do you pay taxes in the United States, any of                  7 that, or just in Canada?                  8 A. I'm a homemaker so typically it is just done                  9 through Canadian taxes.                  10 Q. Did you make income from your -- during your                  11 time with NAC -- I'll refer to NAC Foundation as NAC                  12 during the depo.                  13 Did you make any reportable income working                  14 for NAC?                  15 A. No, I did not.                  16 Q. Okay. You are familiar with NAC, the                  17 plaintiff in this case; yes?                  18 A. Yes, I am.                  19 Q. Tell me when you -- when you first became                  20 aware of that entity, that company?                  21 A. I believe it was early in 2015. My husband                  22 informed me that he received a cold call offering an                  23 investment opportunity.                  24 Q. Now, when you say -- first of all, that                  25 conversation, you did not participate in the call;</p>

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<p>1 correct?</p> <p>2 A. Not at all.</p> <p>3 Q. Do you know with whom you spoke?</p> <p>4 A. I believe it was Marco Diadamo.</p> <p>5 Q. And you're not certain whether Mr. Diadamo</p> <p>6 used the term "investment;" right?</p> <p>7 A. Pardon? Can you repeat that.</p> <p>8 Q. You're not certain whether Mr. Diadamo used</p> <p>9 the term "investment;" correct?</p> <p>10 A. I have no idea. I have no idea.</p> <p>11 Q. Did he -- do you know -- well, you weren't a</p> <p>12 participant in the conversation; correct?</p> <p>13 A. That's correct.</p> <p>14 Q. And when your husband relayed that</p> <p>15 conversation to you, what did he say at that time</p> <p>16 beyond what you just told me?</p> <p>17 A. That he was approached for the opportunity to</p> <p>18 purchase tokens or coins in a AML-compliant</p> <p>19 cryptocurrency. It wasn't live yet, but they were</p> <p>20 hoping to put it live. Similar to Bitcoin, but</p> <p>21 different.</p> <p>22 Q. Okay. Bear with me one second. All right.</p> <p>23 And we'll get into some more of the details of that</p> <p>24 relationship as it evolved later, but let's get into</p> <p>25 some procedural issues. There was a prior litigation</p>	<p>1 THE WITNESS: Yes.</p> <p>2 BY MR. OLSEN:</p> <p>3 Q. Okay. So that claim -- the counterclaims</p> <p>4 were dismissed on August 14th, 2018. I'll make that</p> <p>5 representation to you. Are you aware of that?</p> <p>6 A. No, I was not.</p> <p>7 Q. 2019, I'm sorry. Hang on. Make sure I get</p> <p>8 the dates right. 2019. August 14th, 2019 is the date</p> <p>9 of the Court's order.</p> <p>10 You're aware the Court reached fact findings</p> <p>11 in that order dismissing the claim?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. The allegations -- you read the</p> <p>14 allegations of the counterclaim at some point; correct,</p> <p>15 your counterclaim that you made against NAC?</p> <p>16 A. At some point, yes. After it was filed, I</p> <p>17 believe.</p> <p>18 Q. Okay. Did you -- between the time it was</p> <p>19 filed and the time that it was dismissed, did you</p> <p>20 disagree with the allegations in any way that you had</p> <p>21 made?</p> <p>22 A. We did not see the counterclaim until it was</p> <p>23 dismissed.</p> <p>24 Q. Okay. You didn't?</p> <p>25 A. No.</p>
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<p>1 commenced by NAC against your husband in federal court.</p> <p>2 You're aware of that; correct?</p> <p>3 A. Yes, I am.</p> <p>4 Q. And then this case was commenced in 2018</p> <p>5 against both you -- by NAC against both you and your</p> <p>6 husband; right?</p> <p>7 A. That's correct.</p> <p>8 Q. And then at a point, there was a counterclaim</p> <p>9 filed by you and your husband claimed back, in other</p> <p>10 words, against NAC in this case; correct?</p> <p>11 A. Yes.</p> <p>12 Q. And that counterclaim was dismissed; right?</p> <p>13 A. That's correct.</p> <p>14 Q. Okay. And you were made aware of the</p> <p>15 dismissal at or about the time that it occurred;</p> <p>16 correct?</p> <p>17 A. It was later, I would say.</p> <p>18 MR. KNECHT: Objection. That calls for</p> <p>19 attorney/client privilege.</p> <p>20 MR. OLSEN: And let me be clear. I don't</p> <p>21 want to -- the timing of when you learned of something</p> <p>22 isn't privileged, but I don't want you to discuss any</p> <p>23 conversations, the content of any conversation, you had</p> <p>24 with Mr. Knecht or any other lawyer on your behalf. Do</p> <p>25 you understand?</p>	<p>1 Q. Did you disagree with any of the allegations</p> <p>2 that had been made on your behalf in the counterclaim?</p> <p>3 A. Yes.</p> <p>4 Q. Which allegations -- I'm not asking you to</p> <p>5 cite to a paragraph, but which allegations, generally</p> <p>6 speaking, did you disagree with?</p> <p>7 A. There was confusion in the counterclaim that</p> <p>8 we maintained the hundred million -- we knew the \$100</p> <p>9 million valuation had been changed prior to submitting</p> <p>10 our funds. We knew that.</p> <p>11 Q. You did know that?</p> <p>12 A. Yes, we did.</p> <p>13 Q. Okay. So that portion of the allegations --</p> <p>14 and the Court's conclusion was that -- that you did</p> <p>15 know that at a point in November, before the submission</p> <p>16 of the -- before you paid the \$275,000; correct? So</p> <p>17 that the Court found that?</p> <p>18 A. Yes.</p> <p>19 Q. So that -- I'm looking at the -- I don't</p> <p>20 think you have this, but I'm looking at the</p> <p>21 allegations.</p> <p>22 A. The counterclaim?</p> <p>23 Q. In the counterclaim. And the only other --</p> <p>24 the only other thing -- the counterclaim says, look,</p> <p>25 you had -- you said, "As a result of these meetings</p>

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<p>1 with Marcus, his representations in connection with the</p> <p>2 NAC business plan, and the independent marketing</p> <p>3 valuation, the Jodoins decided to invest in NAC."</p> <p>4 So now you're telling me that the reference</p> <p>5 to the independent marketing valuation as a basis was</p> <p>6 not correct, that that was not a basis for you putting</p> <p>7 your money in?</p> <p>8 A. That is correct. It was the basis for us</p> <p>9 agreeing to help before -- pardon me -- in October when</p> <p>10 we were in Poland and Marcus asked us to come on board.</p> <p>11 It was the business plan that he put forward and gave</p> <p>12 us prior to that had \$140 million asset valuation and</p> <p>13 then us being invited without any prior knowledge to</p> <p>14 the meeting between James Mawhinney and the core</p> <p>15 members of NAC where the \$100 million valuation was</p> <p>16 being talked about. That decision, while we were in</p> <p>17 Poland to come on board, was made with those two</p> <p>18 numbers.</p> <p>19 When we got further into November, and the</p> <p>20 problems with the contract with James Mawhinney, the</p> <p>21 amount that he was charging were revealed and they knew</p> <p>22 that they were going to withdraw from the contract, it</p> <p>23 was still given a \$40 million eval, and a promise that</p> <p>24 we were going to continue with an IPO program with a</p> <p>25 million dollar valuation, just not with</p>	<p>1 still with the understanding that it was going to be a</p> <p>2 long-term position on the stock market, and that that</p> <p>3 was what the company was working -- that was what the</p> <p>4 company was valued with. It just needed to be</p> <p>5 structured so it could be valued that way.</p> <p>6 BY MR. OLSEN:</p> <p>7 Q. Okay. You didn't have any -- well, so let me</p> <p>8 ask you about the other, this reference to</p> <p>9 representations in connection with the business plan</p> <p>10 that was the other stated basis for making the</p> <p>11 investment. We had asked for documents relating to</p> <p>12 that, and there haven't been any documents produced of</p> <p>13 any other representations. Are there any documents</p> <p>14 besides this, the valuation discussion, any other</p> <p>15 documents?</p> <p>16 A. Yes.</p> <p>17 Q. Have you produced -- has your attorney</p> <p>18 produced those documents in this case?</p> <p>19 A. I believe that our attorney has a copy of</p> <p>20 them.</p> <p>21 Q. What sort of documents are we talking about?</p> <p>22 A. It's a business plan.</p> <p>23 Q. Okay. What does the business plan say, if</p> <p>24 anything, about valuation?</p> <p>25 A. It has a asset evaluation with the different</p>
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<p>1 James Mawhinney. And not --</p> <p>2 Q. Sorry. You knew --</p> <p>3 A. That was the events prior to us submitting</p> <p>4 the money.</p> <p>5 Q. You knew the purpose of the Mawhinney</p> <p>6 valuation, whether it was 140 or 40; correct?</p> <p>7 A. I don't understand your question.</p> <p>8 Q. You knew the purpose -- the purpose behind</p> <p>9 the -- what was the purpose behind the valuation</p> <p>10 Mr. Mawhinney was working on?</p> <p>11 A. I understood it, and when discussing it with</p> <p>12 my husband Corey, we understood that that was the</p> <p>13 valuation that the company was worth easily, and that</p> <p>14 was what you would value it to go to an IPO with. We</p> <p>15 were not -- I'm a housewife. I was not overly familiar</p> <p>16 with the idea that an IPO could be done simply to</p> <p>17 generate cash.</p> <p>18 Q. Your husband is not a housewife; right? I</p> <p>19 mean, he was working directly with Mawhinney in email</p> <p>20 exchanges which are part of the court record about what</p> <p>21 the whole purpose of the valuation -- what he and</p> <p>22 Mawhinney were trying to accomplish when they were</p> <p>23 working together with that valuation; correct?</p> <p>24 MR. KNECHT: Objection.</p> <p>25 THE WITNESS: Yes. Yes, it was, but it was</p>	<p>1 prices, Aten coin, and it has the projected value of</p> <p>2 Aten coin, when it would be released, and it has a</p> <p>3 value of \$140 million projected.</p> <p>4 Q. Okay. And is it -- are you telling me that</p> <p>5 because you're a housewife, you don't really understand</p> <p>6 the difference between the projection and the</p> <p>7 valuation?</p> <p>8 MR. KNECHT: Objection. Form.</p> <p>9 BY MR. OLSEN:</p> <p>10 Q. You can answer the question.</p> <p>11 A. No. I understand that it was a projection.</p> <p>12 I understand that. But you assume that there's some</p> <p>13 basis of truth to it. At least when my husband did</p> <p>14 projections in our small construction business, they</p> <p>15 had to be relatively accurate.</p> <p>16 Q. What do you base -- I'm inferring, from what</p> <p>17 you said, that you don't think there's any basis of</p> <p>18 truth in the projections. What do you base that on,</p> <p>19 that statement?</p> <p>20 A. No, I'm not saying I -- I said I assumed that</p> <p>21 there was a great deal of basis of truth to it.</p> <p>22 Q. Okay. Do you still believe that to be the</p> <p>23 case?</p> <p>24 A. No.</p> <p>25 Q. And what leads you to believe that?</p>



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<p>1 A. My experience with what I feel to be the 2 duplicity of Marcus Andrade. 3 Q. So how does that relate to the -- you believe 4 him not to be trustworthy, but tell me what leads you 5 to think there's no basis for the company having 6 some -- having made some projections? What's wrong 7 with the projections? I guess I'm asking you to look 8 back at the time when you were involved looking 9 forward, what was wrong at that point with the 10 projections, in your view, and the basis for them? 11 A. At the time there, what was wrong with them? 12 Q. Yeah. 13 A. Nothing. I felt that they were an adequate 14 projection of what it could do. 15 Q. Okay. And you went to work in a capacity as 16 at least a named officer at a later point for NAC; 17 correct? 18 MR. KNECHT: Objection to form. Calls for a 19 legal conclusion. 20 MR. OLSEN: Let me rephrase that question. 21 BY MR. OLSEN: 22 Q. You took on some duties for NAC at some 23 point; correct? 24 A. Yes, I did. 25 Q. And what was your title?</p>	<p>1 MR. KNECHT: Objection to form. 2 BY MR. OLSEN: 3 Q. What was his -- what was his title? 4 A. COO. 5 Q. Chief operating officer? 6 A. That was correct. Interim. 7 Q. What was the last thing you said? 8 A. It was an interim. 9 Q. Interim COO? 10 A. That's correct. It was only -- 11 Q. Interim until what? 12 A. The IPP was in steady progress. And Corey 13 and I -- Corey, in my presence, told Marcus, we are not 14 qualified to take this to an international company, a 15 company that's worth \$100 million. You'll eventually 16 have to find somebody that has more experience. And 17 then we were offered a position on the board when we 18 stepped down. 19 MR. OLSEN: Okay. Now, I want to ask you 20 about some of the answers to some requests for 21 admissions and some interrogatories that were served 22 upon you in this case at an earlier time. It's about 23 25 after, just about. So what I'm going to do is just 24 direct you for now to where those are on the exhibit. 25 I'm going to hop off the call for a few minutes. But</p>
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<p>1 A. To begin with, I was simply supposed to be 2 helping with housekeeping, organizing policies and 3 procedures that they needed to put up a corporate 4 structure, giving view-back on the web, going to 5 organize the investor wine and cheese. That was 6 originally what it was. 7 When we were in Poland in December and we 8 were working towards getting the corporate structure 9 together so you could go to an IPO position, the chief 10 positions needed to be filled. Marcus had offered me a 11 more, like, head HR or more advanced position, and I 12 simply said I didn't have the qualifications for any of 13 these long-term titles. I have no college degree. 14 I've been a housewife for many years. I said, I'm 15 staying on until the IPO to help you set up your 16 policies and procedures. 17 But we had to have some type of title. When 18 the group was meeting, I believe administration officer 19 was thrown out, and then someone suggested the chief 20 administrative officer. Nobody had really heard of 21 that before, but that was the decision. Marcus liked 22 that title, and that's what I went with. 23 Q. Okay. Your husband also became an officer of 24 the company; correct? 25 A. Yes, he did.</p>	<p>1 we will be looking at -- by the way, Madam court 2 reporter, I do want to -- you received the documents as 3 well; correct? 4 THE STENOGRAPHER: Yes. 5 MR. OLSEN: I'd like to offer the -- just to 6 designate the packet of documents that the witness has 7 as Exhibit 1. That's going to be the sole exhibit 8 today. 9 And just for the record, Mrs. Jodoin, you do 10 have a packet of documents before you, which we'll call 11 Exhibit 1? 12 THE WITNESS: Yes. 13 MR. OLSEN: If you look at the lower, 14 right-hand corner of the first page, you'll see in tiny 15 print, BJodoin0001. Do you see that? 16 THE WITNESS: Yes, I do. 17 MR. OLSEN: I will be referring to those 18 numbers throughout the rest of the deposition. And for 19 your reference, the next documents I'm going to be 20 looking at are the ones that start with BJodoin0082, 21 the admissions responses, and then the answers to 22 interrogatories, which go through about 0095. 23 And so I will, with that, be getting off the 24 line for a bit. I'm not really sure how to mute this. 25 There we go. Got it.</p>

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<p>1 (Whereupon, a recess was taken.)</p> <p>2 BY MR. OLSEN:</p> <p>3 Q. Before we got off the record, Ms. Jodoin, I</p> <p>4 directed you to the discovery responses that you had</p> <p>5 provided in this case, the admissions responses and the</p> <p>6 interrogatory responses. I want to take a look at</p> <p>7 those. The first one I want to take a look at, this is</p> <p>8 in the admissions, and on the second page of the</p> <p>9 admissions, BJodoin0083 is the page.</p> <p>10 A. Okay.</p> <p>11 Q. The request was the following: Admit that</p> <p>12 reports, complaints, referrals and/or supplemental</p> <p>13 information listed and/or described in your answers to</p> <p>14 interrogatories."</p> <p>15 And we'll talk about those, but there's</p> <p>16 questions there about reports to governmental</p> <p>17 authorities, that they included your allegation that</p> <p>18 you relied upon a market valuation of \$100 million or</p> <p>19 more when you decided to remit the \$275,000.</p> <p>20 The point of that, what that boils down to</p> <p>21 is, it's asking you to admit that when you made -- that</p> <p>22 when you made statements to governmental authorities</p> <p>23 about NAC, that you made reference specifically to the</p> <p>24 market valuation of \$100 million or more. I'm asking</p> <p>25 you to admit whether that was something you did.</p>	<p>1 that evaluation through a public offering on the stock</p> <p>2 market.</p> <p>3 Q. Okay. So at this point, this point being</p> <p>4 November, that's when you put your money in, into the</p> <p>5 company, you had already purchased -- we'll call them</p> <p>6 coins for a second -- you already purchased some Aten</p> <p>7 coins; is that correct?</p> <p>8 A. Yes, we had.</p> <p>9 Q. And what was the form -- were those in the</p> <p>10 form of a token that represented a coin? What was the</p> <p>11 form of that thing?</p> <p>12 A. It was tokens in form of the coins that were</p> <p>13 to be -- were rolled over in coins. Once it was to be</p> <p>14 released on market, you could buy and sell coins.</p> <p>15 Q. Okay. So the thing you had actually put your</p> <p>16 money into before November, at least, you'd purchased</p> <p>17 some what they call tokens, which are representative of</p> <p>18 a cryptocurrency. That particular -- well --</p> <p>19 A. No, that's incorrect.</p> <p>20 Q. Okay. What is the token representative of?</p> <p>21 A. Yes, but it was not in November. That had</p> <p>22 been previous to October, from the first part of the</p> <p>23 year up through to October that we had purchased in</p> <p>24 various different times different tokens or coins.</p> <p>25 Q. Okay. Bad question by me.</p>
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<p>1 MR. KNECHT: Objection to form. Calls for a</p> <p>2 legal conclusion as well. Objection to form.</p> <p>3 BY MR. OLSEN:</p> <p>4 Q. Okay. That means you can go ahead and answer</p> <p>5 it.</p> <p>6 Did you make a statement to any governmental</p> <p>7 agencies whether they asked you or you got in touch</p> <p>8 with them, that you had relied upon, you and your</p> <p>9 husband had relied upon, the valuation of \$100 million</p> <p>10 or more?</p> <p>11 A. No. We would have -- we relied on the first,</p> <p>12 like I had said earlier, the \$140 million business</p> <p>13 plan, the \$100 million evaluation from James Mawhinney,</p> <p>14 and then the \$40 million with the promise to still</p> <p>15 obtain IBO or IPO by April.</p> <p>16 Q. Okay. Let me stop you on that last part.</p> <p>17 The promise to do an IPO -- now, are we talking about</p> <p>18 initial public offering or what they refer to in this</p> <p>19 coin world as an initial coin offering, which is an</p> <p>20 ICO, which is a little different?</p> <p>21 A. No. It was the -- what they had hired</p> <p>22 James Mawhinney to do, which was to have an initial</p> <p>23 public offering. When James Mawhinney was -- when they</p> <p>24 parted ways, the plan was to still find someone who</p> <p>25 could do that and work towards an IPO of -- reaching</p>	<p>1 The reference to November, that was when you</p> <p>2 put in -- that's when you agreed to transfer money,</p> <p>3 we'll say, to NAC, \$275,000, for a different purpose.</p> <p>4 But prior to that, you had purchased coins or tokens</p> <p>5 representing coins; correct?</p> <p>6 A. Yes, that is correct.</p> <p>7 Q. Okay. And that particular coin, that</p> <p>8 never -- that one never got off the ground; correct?</p> <p>9 There was a future coin that it was rolled into; is</p> <p>10 that a fair way to put it?</p> <p>11 A. Yes, I believe so. We have done nothing with</p> <p>12 the coins since we left.</p> <p>13 Q. Okay. But those prior purchases, those are</p> <p>14 purchases of a thing, a cryptocurrency or something</p> <p>15 that was to be a cryptocurrency, and that never</p> <p>16 happened. It rolled over into something else later.</p> <p>17 Do you have coins though that -- or tokens that</p> <p>18 represent coins issued by NAC?</p> <p>19 A. We have the original Aten coin. They have</p> <p>20 approached us to roll it over into the new coin and we</p> <p>21 have not.</p> <p>22 Q. Okay. So let me get back to these</p> <p>23 interrogatories. A more fundamental question that's in</p> <p>24 the interrogatories themselves -- these are the</p> <p>25 admissions, sorry. This admission talks about reports,</p>



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<p>1 complaints, referrals. Let me back up a second and ask</p> <p>2 you, I understand from your answers and your husband's</p> <p>3 answers to interrogatories, that you had -- that you</p> <p>4 have spoken to the FBI concerning NAC and/or</p> <p>5 Mr. Andrade at some point; correct?</p> <p>6 A. Yes, that is correct.</p> <p>7 Q. And I also understand from your answers to</p> <p>8 interrogatories, you've spoken at some point to the</p> <p>9 Alberta Securities Commission about the same subject</p> <p>10 matter; correct?</p> <p>11 A. I did not.</p> <p>12 Q. Your husband did?</p> <p>13 A. Yes, he did.</p> <p>14 Q. And you overheard a discussion?</p> <p>15 A. Yes, part of the discussion. I listened in</p> <p>16 on the discussion via he had it on speaker phone.</p> <p>17 Q. Okay. And there was also a conversation --</p> <p>18 there was also -- did you also have a conversation, you</p> <p>19 or your husband, with the Securities &amp; Exchange</p> <p>20 Commission in the United States?</p> <p>21 A. May I clarify a question? May I ask a</p> <p>22 question?</p> <p>23 Q. Just let me -- you don't understand the</p> <p>24 question or?</p> <p>25 A. He contacted SEC, but NAC or Marcus Andrade</p>	<p>1 with the ASC, when was that?</p> <p>2 A. It was after March. I believe it was the end</p> <p>3 of March or the first week or two of April.</p> <p>4 Q. Of what year?</p> <p>5 A. 2016. I believe it was March.</p> <p>6 Q. Okay. And when you had the conversation --</p> <p>7 when he had the conversation which you overheard with</p> <p>8 the ASC in March, by that time, certainly, you knew</p> <p>9 that the 140 or \$100 million figure was not intended as</p> <p>10 a valuation per se; right? You had already known that?</p> <p>11 A. That it wasn't from him looking at the -- I</p> <p>12 don't -- I don't understand what you mean. Because, to</p> <p>13 my opinion, it was still with hard work that was what</p> <p>14 the evaluation would be on an IPO. I don't understand</p> <p>15 anything other than that. I don't understand what</p> <p>16 you're trying to say.</p> <p>17 Q. Your husband had already had conversations</p> <p>18 with Mr. Mawhinney, working with him on the valuation</p> <p>19 in which it was disclosed that the \$140 million or</p> <p>20 \$100 million figure was not something that was an</p> <p>21 actual valuation of the company; correct?</p> <p>22 A. Okay. Yes, that without hard work that the</p> <p>23 \$100 million was not guaranteed, that is correct. And</p> <p>24 he said it was worth \$40 million.</p> <p>25 Q. And Mr. Mawhinney also didn't guarantee that</p>
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<p>1 was never mentioned. It was a hypothetical question.</p> <p>2 Q. Okay. All right. We'll come back to that.</p> <p>3 So the admission here that we're looking at,</p> <p>4 when it talks about reports, complaints, referrals,</p> <p>5 supplemental information, it's meant to address any</p> <p>6 communications with the FBI, SEC, or ASC. And the</p> <p>7 question again was, you know, admit that you disclosed</p> <p>8 to any of those entities that you relied at least in</p> <p>9 part on this market valuation. That's what it's</p> <p>10 asking. And do you deny that?</p> <p>11 MR. KNECHT: Objection to form.</p> <p>12 BY MR. OLSEN:</p> <p>13 Q. You can answer the question.</p> <p>14 A. How do I say this? When it was mentioned to</p> <p>15 the ASC, because that was the conversation that I was</p> <p>16 privy to, all three numbers were given to them.</p> <p>17 Q. What do you mean "all three numbers?" Which</p> <p>18 numbers?</p> <p>19 A. The \$140 million, the business plan, the</p> <p>20 million-dollar evaluation for the IP. And then after</p> <p>21 this IP was unsuccessful with James Mawhinney, the</p> <p>22 \$40 million evaluation after that. So no one number</p> <p>23 was given as a primary reason for submitting the</p> <p>24 income -- the money, pardon me.</p> <p>25 Q. Well, when your husband had a conversation</p>	<p>1 it was worth \$40 million. That was a projection;</p> <p>2 correct?</p> <p>3 A. I didn't understand it to be that.</p> <p>4 Q. Well, Mr. Mawhinney never guaranteed the</p> <p>5 company was worth \$40 million in discussions with you</p> <p>6 or with your husband; right?</p> <p>7 A. No, he did not.</p> <p>8 Q. And Mr. Andrade never guaranteed to you that</p> <p>9 the company was worth \$40 million?</p> <p>10 MR. KNECHT: Objection. Form.</p> <p>11 BY MR. OLSEN:</p> <p>12 Q. You can answer that question.</p> <p>13 A. It was implied.</p> <p>14 Q. Yeah, but your husband was working with</p> <p>15 Mawhinney on the valuations and projections, and he</p> <p>16 never told you -- your husband never told you that it</p> <p>17 was guaranteed it was worth \$40 million, did he?</p> <p>18 A. No, but your -- it was still implied. My</p> <p>19 husband has a company, and there's a value that you put</p> <p>20 to it when you're doing your assets or your taxes. And</p> <p>21 this was the value that it was evaluated at.</p> <p>22 Q. This company never, to your knowledge, had --</p> <p>23 well, certainly at that point hadn't filed any tax</p> <p>24 returns; correct?</p> <p>25 A. We found that out after, yes.</p>

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<p>1 Q. Well, it didn't have any income to file tax</p> <p>2 returns at that point so it hadn't had any tax returns</p> <p>3 filed. So that wasn't the purpose of this valuation;</p> <p>4 right?</p> <p>5 A. I disagree with that comment.</p> <p>6 Q. Well, let me break the question down. You</p> <p>7 disagree that the purpose -- strike that.</p> <p>8 The purpose of this, these projections,</p> <p>9 wasn't to pay taxes; right?</p> <p>10 A. Of course. Of course, but I disagree with</p> <p>11 the fact that it didn't have income. It was selling</p> <p>12 tokens. As far as we were concerned, it had income.</p> <p>13 Q. Okay. I asked a bad question. It wasn't for</p> <p>14 the same -- this paperwork wasn't prepared for the same</p> <p>15 purpose that your husband would prepare his company</p> <p>16 paperwork for an operating business that, you know, had</p> <p>17 filed taxes and all that? That wasn't the purpose of</p> <p>18 these documents; correct?</p> <p>19 A. No, that is correct, but an evaluation for a</p> <p>20 company when you're doing quarterly profits or</p> <p>21 quarterly projections has nothing to do with taxes.</p> <p>22 It's a proof to your business partners and to decide if</p> <p>23 the business is viable. When my husband did quarterly</p> <p>24 projections, it was to make sure that the profit</p> <p>25 margins were correct and that you could pay your bills.</p>	<p>1 A. No. Just those general kind of</p> <p>2 conversations, explaining the values of the patents.</p> <p>3 Also he did explain the values of the patents and</p> <p>4 showed us an offer where he had been offered two or</p> <p>5 three million dollars to purchase the patents.</p> <p>6 Q. Okay. Do you know the value of the patents</p> <p>7 at this time?</p> <p>8 A. No idea.</p> <p>9 Q. Did you know the value of the patents at that</p> <p>10 time?</p> <p>11 A. Two to three million dollars.</p> <p>12 Q. Okay. But you don't know any different?</p> <p>13 A. No, nothing.</p> <p>14 Q. Okay. In the next admission request, the</p> <p>15 request includes the Court's finding made in this case</p> <p>16 that Mr. Jodoin certainly knew as far back as</p> <p>17 November 22nd that the projected valuation -- well,</p> <p>18 what it says actually is, "Back as far as</p> <p>19 November 22nd, 2015, Mr. Jodoin received an email</p> <p>20 expressly referencing an original projected value of</p> <p>21 only \$40 million."</p> <p>22 Thereafter stating that, "As it stands today,</p> <p>23 the company is not worth \$100 million without a lot of</p> <p>24 planning and packaging in the right way for the</p> <p>25 investment community."</p>
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<p>1 That was the expected value of the company.</p> <p>2 Q. Right. But my point is what he does in his</p> <p>3 business isn't the same kind of thing that was going on</p> <p>4 here with NAC; correct? I mean, that wasn't the</p> <p>5 purpose of preparing these projections; right?</p> <p>6 A. To my knowledge, it was. We did not</p> <p>7 understand -- I especially did not understand that they</p> <p>8 were not the same thing.</p> <p>9 Q. Okay. Getting back to this question, this</p> <p>10 admission number 1, what other -- hang on one second.</p> <p>11 Have you described all of the documents and</p> <p>12 representations that Mr. Andrade made on which you</p> <p>13 relied in paying the \$275,000?</p> <p>14 MR. KNECHT: Objection to form.</p> <p>15 THE WITNESS: There was various -- there were</p> <p>16 various verbal conversations that we had.</p> <p>17 BY MR. OLSEN:</p> <p>18 Q. Tell me what those were.</p> <p>19 A. Can you imagine by April that that would be</p> <p>20 \$5 million or various -- we'll need to set up trust</p> <p>21 funds for the kids. We'll need to -- we're going to</p> <p>22 have to make a legacy of this because the amount of</p> <p>23 money that we're going to be making. I can't wait</p> <p>24 until we take over Bitcoin.</p> <p>25 Q. Anything else?</p>	<p>1 And the Court made those findings, and you</p> <p>2 were asked to admit that the reports, complaints,</p> <p>3 referrals, information provided to governmental</p> <p>4 authorities were made after this finding by the</p> <p>5 Court -- I'm sorry, in light of these facts. And you</p> <p>6 were asked to admit that they were false reports. Your</p> <p>7 answer was to deny that, but it was also to say,</p> <p>8 "Discovery is ongoing, and defendant will supplement</p> <p>9 this request as additional information is discovered."</p> <p>10 Have you discovered any additional</p> <p>11 information to support your denial that the allegation</p> <p>12 made to these authorities was a false statement?</p> <p>13 MR. KNECHT: Objection to form. Yeah,</p> <p>14 objection to form. Asked and answered.</p> <p>15 You can go ahead and respond, Brandi.</p> <p>16 THE WITNESS: Once again, I'll tell you again</p> <p>17 that we did not see the counterclaim, nor these. It</p> <p>18 was never to be if you would have -- it was, no, we</p> <p>19 admit we knew before the 22nd. We admit that and never</p> <p>20 did we say it was only \$100 million. The number was</p> <p>21 \$140 million from Marcus, \$100 million from</p> <p>22 James Mawhinney. And I will state the people involved</p> <p>23 with NAC, the lawyer, the other people that we were --</p> <p>24 the opinion was that was discussed afterwards, that</p> <p>25 James Mawhinney had misrepresented what he could do for</p>

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<p>1 NAC, and now was putting out that number because he</p> <p>2 wanted to be paid more to do more work. That was part</p> <p>3 of the argument there. The \$40 million, even</p> <p>4 afterwards when James Mawhinney was dismissed, that was</p> <p>5 still a substantial amount of money. We knew that it</p> <p>6 was \$40 million.</p> <p>7 BY MR. OLSEN:</p> <p>8 Q. Okay. And when was the discussion about</p> <p>9 Mawhinney being dismissed because, as I gather, he was</p> <p>10 overstating things? When was that discussion?</p> <p>11 A. It was various discussions through Skype and</p> <p>12 audio. And, to my knowledge, our largest complaint was</p> <p>13 not that he was over-evaluating the company. It's that</p> <p>14 he had not disclosed to the people involved who signed</p> <p>15 the contracts, Aga and Marcus, that to develop the</p> <p>16 business corporate structure needed to do \$100 million,</p> <p>17 that was not included in their fee. And after that</p> <p>18 point, the fee was going to be too large that there was</p> <p>19 absolutely no reason to do it. It was never really</p> <p>20 that he had over-evaluated what it could be. It was</p> <p>21 that he was going to charge too much for it. The</p> <p>22 expectation was to find someone else and still achieve</p> <p>23 that \$100 million.</p> <p>24 Q. The discussions about Mr. Mawhinney, when did</p> <p>25 that take place, in January or --</p>	<p>1 officers of any investigative or law enforcement agency</p> <p>2 to which you reported any actions of the NAC Foundation</p> <p>3 or Marcus Andrade, being sure to include the date of</p> <p>4 each report, the parties to all communications</p> <p>5 regarding the report, and the summary of each report or</p> <p>6 communications.</p> <p>7 You see that?</p> <p>8 A. Yes, I do.</p> <p>9 Q. Now, I will tell you, just because I've read</p> <p>10 both sets of answers, this was a supplemental answer.</p> <p>11 I want to make sure it's clear when I ask these</p> <p>12 questions now that you understand by "report," I don't</p> <p>13 mean a writing necessarily. It could be something</p> <p>14 verbal. And I don't mean something initiated by you.</p> <p>15 By "report," I mean something you told --</p> <p>16 A. A discussion?</p> <p>17 Q. -- told to somebody verbally, note to</p> <p>18 somebody in writing, any form of communication.</p> <p>19 A. Okay.</p> <p>20 Q. The answer starts with, "I did not make a</p> <p>21 report regarding the actions of NAC Foundation or</p> <p>22 Marcus Andrade to any federal, state, provincial and/or</p> <p>23 local authorities except as detailed below."</p> <p>24 And there you listed -- you stated the FBI</p> <p>25 and ASC. Now, you mentioned that your husband got in</p>
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<p>1 A. No. Between November and December. By the</p> <p>2 end of November, December.</p> <p>3 Q. Okay. So before January of the following --</p> <p>4 of '16?</p> <p>5 A. That's correct.</p> <p>6 Q. Was someone located to do new projections?</p> <p>7 A. Projections, you mean to facilitate an IPO?</p> <p>8 Q. Do a valuation or projections, whichever you</p> <p>9 want to call them.</p> <p>10 A. Marcus was asked numerous times, and it was</p> <p>11 always put off.</p> <p>12 Q. Okay. Before the first of the year 2016, the</p> <p>13 whole Mawhinney valuation or projection number set was</p> <p>14 sort of put off to the side because NAC was looking for</p> <p>15 someone new to do this work who wasn't going to benefit</p> <p>16 from, in a fee structure, from just having a high</p> <p>17 number; right?</p> <p>18 A. Correct.</p> <p>19 Q. Okay. Take a look at the interrogatory</p> <p>20 answers, which I'm starting on page BJodoin0086. You</p> <p>21 see Interrogatory No. 1 on that page?</p> <p>22 A. Yes.</p> <p>23 Q. Interrogatory No. 1 asks that you please list</p> <p>24 all federal, state, provincial and/or local</p> <p>25 authorities, including, but not limited to, agents or</p>	<p>1 touch with the SEC?</p> <p>2 A. Um-hum.</p> <p>3 Q. Is your answer based on the fact that you</p> <p>4 didn't do it, he did it?</p> <p>5 A. Correct. I was not present at all with the</p> <p>6 SEC. And I also know that when I discussed it with my</p> <p>7 husband, he did not use NAC's name or Marcus Andrade.</p> <p>8 Q. Did he receive any follow-up from the SEC?</p> <p>9 MR. KNECHT: Objection.</p> <p>10 MR. OLSEN: Do you have an objection,</p> <p>11 Counsel?</p> <p>12 MR. KNECHT: Objection to form. Did you ask</p> <p>13 whether Corey received anything?</p> <p>14 MR. OLSEN: I did.</p> <p>15 MR. KNECHT: Okay. Objection to form.</p> <p>16 BY MR. OLSEN:</p> <p>17 Q. You don't know or Corey didn't?</p> <p>18 A. I believe he had a phone call, call to him</p> <p>19 afterwards. I have no idea what was said.</p> <p>20 Q. Okay. And then the answer goes on to say --</p> <p>21 well, it says you listened. The answer also says,</p> <p>22 "With respect to the FBI, they contacted us through</p> <p>23 counsel."</p> <p>24 Again, I don't want you to tell me what your</p> <p>25 counsel said, but I want to -- do you mean by that that</p>

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<p>1 the FBI reached out to your counsel and then after that</p> <p>2 happened, you spoke to the FBI?</p> <p>3 A. That is correct.</p> <p>4 Q. Okay. Do you know whether the FBI contacted</p> <p>5 your counsel because he inquired of the FBI?</p> <p>6 A. Can you repeat that last part.</p> <p>7 Q. Who contacted -- did the FBI contact your</p> <p>8 counsel or did your counsel contact the FBI, if you</p> <p>9 know?</p> <p>10 A. The FBI informed us that they were</p> <p>11 investigating Marcus Andrade, and they contacted our</p> <p>12 lawyer.</p> <p>13 Q. When did that occur?</p> <p>14 A. I don't know when they contacted our lawyer,</p> <p>15 but I know that we were in -- it says here August 27,</p> <p>16 2019. That's when we were in our lawyer's office with</p> <p>17 the FBI.</p> <p>18 Q. That's 2019, not 2018?</p> <p>19 A. No. 2019.</p> <p>20 Q. Didn't you --</p> <p>21 A. Wait a minute.</p> <p>22 Q. Isn't that incorrect?</p> <p>23 A. Perhaps.</p> <p>24 Q. Just basing it -- just to put everything in</p> <p>25 context, I'm looking back at --</p>	<p>1 A. I have never contacted or communicated to the</p> <p>2 FBI in any way.</p> <p>3 Q. Had your husband before that time?</p> <p>4 A. No.</p> <p>5 Q. If the date is correct --</p> <p>6 MR. KNECHT: Counsel, I just looked at that.</p> <p>7 It's 2018. August 27, 2018.</p> <p>8 MR. OLSEN: Okay. So that's confirmed. So</p> <p>9 the interrogatory answer was incorrect, but that's</p> <p>10 fine. We see it's 2018.</p> <p>11 BY MR. OLSEN:</p> <p>12 Q. All right. So in the August 27, 2018 meeting</p> <p>13 you had with the FBI -- first of all, who were the FBI</p> <p>14 agents?</p> <p>15 A. Catherine Abbott and Rohan Wynar.</p> <p>16 Q. W-E-I-N-E-R?</p> <p>17 A. No. W-Y-N-A-R, I believe.</p> <p>18 Q. And those agents, when they sat down with</p> <p>19 you, where did that occur?</p> <p>20 A. In our lawyer's office.</p> <p>21 Q. And when they sat down with you in your</p> <p>22 lawyer's office, I assume that they started the</p> <p>23 conversation or the discussion. What did they say to</p> <p>24 you?</p> <p>25 A. They told us they had had a complaint from an</p>
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<p>1 THE WITNESS: Taylor was born in 2018, Corey?</p> <p>2 Taylor was born in 2018; right?</p> <p>3 Yes, it would have been 2018. I have an</p> <p>4 email that I can double-check.</p> <p>5 BY MR. OLSEN:</p> <p>6 Q. Has that email been -- is that email from</p> <p>7 your attorney?</p> <p>8 A. Yes.</p> <p>9 Q. I don't need the email, but if you</p> <p>10 double-check that date, that's fine. You can make a</p> <p>11 correction on the deposition. But I understand now</p> <p>12 that it's probably 2018?</p> <p>13 A. That is correct. Our infant was only about</p> <p>14 six months old, which would have been 2018.</p> <p>15 Q. Okay. So at the time -- was that the first</p> <p>16 time, on August 27, 2018, that you or your husband ever</p> <p>17 communicated with the FBI concerning NAC or Mr. Andrade</p> <p>18 in any way?</p> <p>19 A. The week prior to that I received an email</p> <p>20 from Catherine confirming that we were going to be</p> <p>21 there, but that was on their direction as well. Prior</p> <p>22 to the first contact by our lawyer to us, we had never</p> <p>23 talked to the FBI before.</p> <p>24 Q. Putting aside speaking, had you contacted the</p> <p>25 FBI and provided them any written information?</p>	<p>1 investor or coin purchaser, I can't remember. From the</p> <p>2 second set of when Marcus had turned the coin into</p> <p>3 another coin and re-branded, that there was an investor</p> <p>4 or coin owner has been, they felt -- the coin owner</p> <p>5 felt that they had been misled. And they contacted the</p> <p>6 FBI and the FBI launched an investigation on Marcus and</p> <p>7 NAC. And when going through their information, going</p> <p>8 through different publications, they came across our</p> <p>9 name.</p> <p>10 Q. Did they tell you how exactly they came</p> <p>11 across your name, in what communications?</p> <p>12 A. I honestly cannot remember.</p> <p>13 Q. The person that was the complainant, who was</p> <p>14 that?</p> <p>15 A. I have no idea. They did not reveal that to</p> <p>16 us.</p> <p>17 Q. Did they describe -- besides what you told me</p> <p>18 already, did they describe specific to that person's</p> <p>19 experience in going through the questions they asked of</p> <p>20 you?</p> <p>21 A. Absolutely not.</p> <p>22 Q. Let me ask you what questions they asked of</p> <p>23 you then.</p> <p>24 A. They asked us to, explain to us how we got</p> <p>25 involved with NAC, if we were coin holders first.</p>



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<p>1 Agent Rohan was extremely interested if we had had any</p> <p>2 experience with the coding or had seen if it was -- the</p> <p>3 technology was actually working, which we did not.</p> <p>4 They asked us -- they walked us through our term at NAC</p> <p>5 and then they asked us to explain why we became</p> <p>6 hesitant in what we had seen there. And then they</p> <p>7 asked us why we had left.</p> <p>8 Q. With respect to -- did you have a discussion</p> <p>9 with them about putting in the \$275,000?</p> <p>10 A. Yes, we did.</p> <p>11 Q. Did you tell them -- did you tell the FBI</p> <p>12 that by the time you put in the \$275,000, you knew that</p> <p>13 the company was not worth \$140 million?</p> <p>14 A. I don't know.</p> <p>15 Q. Did you tell the FBI at that point that by</p> <p>16 the time you put in your money, that you thought it was</p> <p>17 worth no more than \$40 million?</p> <p>18 A. No. I don't know.</p> <p>19 Q. Did you tell the FBI that you had relied on</p> <p>20 any representation of value in putting your money in?</p> <p>21 A. Well, yes.</p> <p>22 Q. And what did you tell them that</p> <p>23 representation was or that value?</p> <p>24 A. The business plan, the proposed value from</p> <p>25 the plan for the IPO, and Marcus' word. Our largest</p>	<p>1 MR. KNECHT: Objection to form. Go ahead.</p> <p>2 THE WITNESS: You need to understand we had</p> <p>3 never encountered any kind of business like this</p> <p>4 before. My husband runs a small business. We're a</p> <p>5 construction company. He's been successful, but it is</p> <p>6 small. When you are given those kind of numbers with</p> <p>7 what we understand projections in business, even though</p> <p>8 Jason -- James Mawhinney said it was \$40 million, it's</p> <p>9 not even worth that, in the group with Aga and Igor and</p> <p>10 Marcus and the people that obviously knew more than we</p> <p>11 did, the common thought was, he's -- he's just blowing</p> <p>12 smoke because he wants to increase his fees.</p> <p>13 Marcus didn't, Aga didn't, Igor didn't, no</p> <p>14 one that had been there long term agreed with that</p> <p>15 \$40 million evaluation. It was, we will find someone</p> <p>16 else. We'll put in the hard work necessary and</p> <p>17 \$100 million will be easy to attain. I don't -- even</p> <p>18 now, I don't truly understand from a business</p> <p>19 perspective the difference between a projection for an</p> <p>20 IPO to state that it's not the actual real value. I</p> <p>21 don't understand that.</p> <p>22 So, to our knowledge, when you're sitting</p> <p>23 there and the lawyers are saying yes and Marcus is so</p> <p>24 focused on how James was trying to elicit more money</p> <p>25 for a job that he agreed to, never was it discussed</p>
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<p>1 reason for believing it was Marcus convinced us that it</p> <p>2 was worth that.</p> <p>3 Q. That's based upon the kind of statements you</p> <p>4 told me Marcus made earlier in the deposition?</p> <p>5 A. Yes. We trusted Marcus.</p> <p>6 Q. And there wasn't anything else you said</p> <p>7 beyond those, kind of, general statements that you</p> <p>8 recall Marcus saying other than these things that were</p> <p>9 for example, in the Mawhinney valuation?</p> <p>10 A. Well, all the way through when we had -- when</p> <p>11 we had came to him and we would be asking questions,</p> <p>12 one of his comments -- comment was, hold on tight.</p> <p>13 Remember, we're going for that hundred-million</p> <p>14 valuation. We're going to go public. Just hang on</p> <p>15 tight. We're going for that legacy.</p> <p>16 Q. Okay. But in discussing why you made your</p> <p>17 investment with the FBI, you did say to the FBI that</p> <p>18 you had relied to some extent on the valuation of</p> <p>19 Mawhinney; correct?</p> <p>20 A. To some extent, yes. Not completely.</p> <p>21 Q. But that was not true; right? Because you</p> <p>22 knew by the time you put your money in that that</p> <p>23 valuation wasn't 140, wasn't even \$100 million, that</p> <p>24 that purpose of that was projections to go forward to</p> <p>25 an IPO; right?</p>	<p>1 that we were canceling because the company was not</p> <p>2 worth that \$100 million. It was still an active goal</p> <p>3 and promise that when we go to an IPO, this is what's</p> <p>4 going to be.</p> <p>5 BY MR. OLSEN:</p> <p>6 Q. Besides what you've told me already, when did</p> <p>7 Mr. Andrade make a promise about any certain value,</p> <p>8 whether it's 40 or some other value?</p> <p>9 A. Can I say he promised that it was a</p> <p>10 guarantee -- it's what he said it was. We assumed he</p> <p>11 was telling the truth. We assumed that it was not just</p> <p>12 conjecture.</p> <p>13 This was his business. This is what the</p> <p>14 goals were. And he was extremely confident. Everyone</p> <p>15 on the team was confident that this was easy and</p> <p>16 attainable.</p> <p>17 Q. Okay. He was positive. He was a</p> <p>18 cheerleader, Mr. Andrade; is that fair to say?</p> <p>19 A. Yes.</p> <p>20 Q. Now, your husband became the chief operating</p> <p>21 officer at a point. And he was even involved -- he was</p> <p>22 involved to -- in trying to get an IPO on the</p> <p>23 Australian stock exchange; correct?</p> <p>24 A. Yes, he was.</p> <p>25 Q. And in speaking to people about that IPO --</p>

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<p>1 he spoke to some people to try to make that happen; 2 right, some people outside the company? 3 A. That's James Mawhinney and James Mawhinney's 4 partner, Jeff somebody. 5 Q. Didn't your husband do an infomercial or a -- 6 A. Oh -- 7 Q. Let me finish -- promotional video with 8 Kathy Ireland to promote the stock and the potential 9 IPO? 10 A. Yes. 11 Q. Okay. So he held himself out as a 12 representative of this company to try to do the same 13 thing, to encourage the success of an IPO; correct? 14 MR. KNECHT: Objection. Objection. Form. 15 Calls for a legal conclusion. Go ahead. 16 THE WITNESS: Yes, he did. It was based only 17 on those evaluations than what Marcus said because 18 Marcus refused to give over the financials to allow 19 Corey or anyone to do a proper projection or a business 20 plan. 21 BY MR. OLSEN: 22 Q. So what you had seen up to that point, 23 including through the time that Corey did this 24 promotion, was not a proper business plan? 25 A. It was a business plan that he gave, but</p>	<p>1 A. I have no idea. We gave them permission to 2 take whatever information that the lawyer had. 3 Q. In that meeting -- and I see the spelling of 4 the names here. Apologize for putting you through the 5 spelling before -- with Agents Abbott and Wynar, you 6 did not tell them -- well, strike that. 7 When you had that meeting, you didn't tell 8 the FBI that at a point you didn't understand the 140, 9 \$140 million valuation or \$100 million valuation to be 10 accurate? Did you tell them you didn't consider it to 11 be accurate? 12 A. Can you repeat that. At what point? What do 13 you mean? 14 Q. During your interview, you said that you 15 disclosed to the FBI having relied, at least in part, 16 on the Mawhinney projections? 17 A. Um-hum. 18 Q. Is that a "yes?" 19 A. I was saying go on. I apologize. 20 Q. And you described the other part of what you 21 relied upon, you totally relied on the statements that 22 Mr. Andrade made that you've talked about already in 23 the deposition. With respect to the first part, with 24 respect to your telling them that you relied to some 25 extent on the Mawhinney projections, you did not at any</p>
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<p>1 there was no -- there was no financial records from the 2 accountant. 3 Q. Yet, your husband promoted the stock as the 4 COO or the potential offering as the COO of the 5 company; correct? 6 A. Yes, he did. 7 Q. Now, let me get back again to the interview 8 you had with the FBI just so we're clear. When you met 9 with the FBI -- first, was that the only meeting, on 10 August 27th, 2018? 11 A. That is correct. 12 Q. Was there any other conversation that you or 13 your husband had by phone with the FBI after that? 14 A. No. 15 Q. Did you provide to the FBI after that any 16 written documentation of any kind? 17 A. During the meeting, we allowed them to take 18 all the correspondence that our lawyer had and all of 19 the information we had accumulated while we were in 20 NAC. 21 Q. Did they ask for that or did you volunteer 22 it? 23 A. They asked for it. 24 Q. Did you provide them with any communications 25 from your lawyer at that time?</p>	<p>1 point in that discussion with the FBI tell them what 2 you just told us on the record, that you had doubts 3 about the \$40 million, that you knew it wasn't a 4 specific valuation? You didn't tell the FBI that, did 5 you? 6 A. I don't -- during the conversation with the 7 FBI, I know that at some point in time towards the end, 8 I told him that in my opinion I believed, now that we 9 had left, that there was very little truth to any of 10 the documentation that Marcus gave us. 11 Q. But you knew by January 2016 that the 12 Mawhinney documents weren't a specific representation 13 of the value of the company; right? You've told me 14 that already today. 15 A. Once again, I will say I did not understand 16 the difference. I understood that James Mawhinney was 17 asking for too much. I understood that this was 18 working towards -- because there was -- the policies 19 weren't put together. The board of directors -- the 20 company was not structured to be a \$100 million 21 company. It was not structured to go live. It wasn't 22 until we left and that we really -- or the end of 23 February where we started having a great deal of 24 difficulty with not seeing the financials and what not, 25 that we truly believed, that we became to realize, that</p>



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<p>1 it was not a valuation that you could sustain. Up 2 until then, we -- I was under the impression that it 3 was what we were working towards and it would be an 4 easily attainable goal. Once again, I did not 5 understand the difference between the projection and 6 the value. 7 Q. Okay. My question though is you didn't tell 8 the FBI you didn't understand the difference; right? 9 MR. KNECHT: Objection. 10 THE WITNESS: I didn't, no. 11 BY MR. OLSEN: 12 Q. And you didn't tell the FBI about the 13 discussion internally about Mawhinney wanting -- being 14 gotten rid of because he wanted too much money and 15 that's why he was making this projection. You didn't 16 have that discussion with the FBI, did you? 17 A. I believe we did. I believe because I 18 remember Rohan asking why did we not send flags up with 19 Mawhinney. And our answer was because we felt he was 20 unethical and we still trusted Marcus. 21 Q. Did the agents, either one of them, Abbott or 22 Wynar, at that meeting say anything to you about this 23 valuation or projection issue? 24 A. Not really. I don't feel that that was the 25 focus of their -- of their -- the majority of their</p>	<p>1 Q. Never assume that about law enforcement. 2 Let's talk about the Alberta Securities 3 Commission. First of all, I believe you said that 4 Corey contacted them first, the Commission; correct? 5 A. Yes. 6 Q. The interview that's referenced in your 7 answers in or about March 16, did that follow an 8 initial communication Corey had with the ASC? Did he 9 get in touch with them first and then this interview 10 came later? 11 A. I have no idea. 12 Q. You were listening to this call, and you 13 don't know if there was any previous communication 14 between Corey and the ASC? 15 A. No, I don't. I came in about five minutes 16 into it. We have 12 children. Somebody was upset. I 17 was not there for the first five minutes. 18 Q. Good on you, by the way, 12 children. 19 You said that Corey had initiated the 20 communication with the ASC though; right? 21 A. That is correct. 22 Q. What is it that he told the ASC? 23 A. I wasn't present when he was first there so I 24 can't tell you everything he said. In communications, 25 we had had our doubts about not really seeing the</p>
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<p>1 questions or discussions. 2 Q. You told me that they asked, the FBI asked, 3 whether you thought the intellectual property was real, 4 whether it functioned. And what else did they -- did 5 they tell you something that this coin buyer had said 6 to them? Did they give you any of that information? 7 A. I don't know who that person is. 8 Q. Well, I know. 9 A. I don't know who that is. 10 Q. Okay. But did they say, like, for example, 11 well, this guy told us, you know, the company had this 12 problem or this is why it's not real. Or did they 13 suggest any thinking the FBI had about what they found 14 in their investigation so far? 15 A. No, they did not. 16 Q. Did the FBI agents tell you that Marcus had 17 done something wrong? 18 A. They were investigating him. They were under 19 the impression they felt that there could have been 20 wrongdoing done. That's why they were investigating 21 him. 22 Q. Is that your assumption because they were 23 doing an investigation or did they tell you, we're 24 investigating him because we think he did X, Y, Z? 25 A. I think that's an assumption I made.</p>	<p>1 finances and him not being willing to give us any 2 shares. And we did not have an agreement. So I know 3 those were the questions that we were concerned about. 4 I don't know exactly what Corey said. 5 Q. Now, in your answer to interrogatory, this 6 interrogatory, you say, "I was on the call but did not 7 speak to anyone. The ASC informed us that Marcus was 8 not registered to sell securities." 9 Was that a statement that the ASC made in 10 that conversation that you heard? 11 A. Yes. 12 Q. You go on to say, "And that what NAC was 13 selling was a security." 14 The ASC didn't actually say that in that 15 call; correct? 16 A. That was the impression that I got, that it 17 was considered -- it would be considered an unsecured 18 security. 19 Q. Okay. That was the impression that you had. 20 A. That is what I remember. I cannot say 21 exactly how it was said, but I distinctly remember that 22 the legality of what was happening being questioned and 23 the legality firmly being listed that the tokens could 24 definitely be considered a security. And in his 25 opinion -- I felt like he was saying in his opinion it</p>

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<p>1 was.</p> <p>2 Q. What's the name of that person?</p> <p>3 A. I -- I have no idea. You would have to ask</p> <p>4 my husband's report on it, like his paperwork.</p> <p>5 Q. And I will do that, but let me ask you. Were</p> <p>6 you aware of any subsequent written or oral</p> <p>7 communications that your husband had with the ASC after</p> <p>8 that?</p> <p>9 A. I don't know.</p> <p>10 Q. The answer to interrogatory goes on to say,</p> <p>11 "ASC explained that the Aten coin was a form of</p> <p>12 unregistered security, and that selling the coin and</p> <p>13 shares in the company not yet formed could be</p> <p>14 considered an act in violation of securities laws."</p> <p>15 Now, since that's in your answer to</p> <p>16 interrogatory, this is you stating what the ASC</p> <p>17 explained, I want to ask you, is this actually what the</p> <p>18 ASC agent said to you or to your husband?</p> <p>19 A. I don't know if it was word for word. This</p> <p>20 is four years later. I am trying to remember to the</p> <p>21 best of my ability exactly what was said.</p> <p>22 Q. The ASC didn't have any real detail about the</p> <p>23 Aten coin or coin token at the time of this</p> <p>24 conversation, did it, just some oral representations</p> <p>25 about what was -- what Corey was asking about?</p>	<p>1 should be. And that it was -- we were advised to get</p> <p>2 out and to desist the selling of the coins and to</p> <p>3 inform the other two investors on what we were told.</p> <p>4 Q. Didn't you go ahead after that call with a</p> <p>5 meeting or conference or whatever in which you</p> <p>6 introduced the coins and NAC to friends and relatives</p> <p>7 of yours?</p> <p>8 A. No. That was in January.</p> <p>9 Q. Okay. January 2016?</p> <p>10 A. Yes.</p> <p>11 Q. What was the date in January?</p> <p>12 A. 21st, I think. I'd have to look back in my</p> <p>13 notes.</p> <p>14 Q. Okay.</p> <p>15 A. Actually, I think it was the 16th. It might</p> <p>16 have been our son's birthday.</p> <p>17 Q. The meeting or conference you had with those</p> <p>18 people to -- what was it that you were promoting at</p> <p>19 that point? Was it the tokens or coins?</p> <p>20 A. The tokens/coins.</p> <p>21 Q. Okay. It was not an investment in shares in</p> <p>22 NAC; correct?</p> <p>23 A. No.</p> <p>24 Q. But you already knew -- you already knew by</p> <p>25 January, didn't you -- you had already been -- you had</p>
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<p>1 A. Based on information my husband had given</p> <p>2 them, that was the recommendation they made.</p> <p>3 Q. Well, doesn't sound like a recommendation to</p> <p>4 me. It says, "They explained -- they explained the</p> <p>5 coin was a form of unregistered security and that</p> <p>6 selling the coin and shares in the company not yet</p> <p>7 formed could be considered an act in violation of the</p> <p>8 securities laws."</p> <p>9 Could be?</p> <p>10 A. Um-hum.</p> <p>11 Q. There was never a statement by the ASC that</p> <p>12 either of these things was a violation of the</p> <p>13 securities laws, was there?</p> <p>14 MR. KNECHT: Objection to form.</p> <p>15 BY MR. OLSEN:</p> <p>16 Q. You may answer the question.</p> <p>17 A. They told us, from what I understood and that</p> <p>18 I can remember, that for Marcus to have taken our</p> <p>19 investment with the promise of future shares in a</p> <p>20 company was a violation. They also then said that in</p> <p>21 his opinion, that the selling of us gathering together</p> <p>22 people and selling the coins or the tokens that could</p> <p>23 be turned into coins would be considered a security.</p> <p>24 And he asked us for the names and he said, they are not</p> <p>25 registered in Canada to sell securities, and that they</p>	<p>1 already been to the office in Las Vegas by that time,</p> <p>2 hadn't you?</p> <p>3 A. Yes, I believe so. I'm not -- I don't quite</p> <p>4 remember if it was before or right after. I believe it</p> <p>5 was before.</p> <p>6 Q. The office was before?</p> <p>7 A. Yes.</p> <p>8 Q. You said in your pleadings that your visit,</p> <p>9 in addition to these other issues, your visit to the</p> <p>10 office had led you to have concerns about NAC; right?</p> <p>11 A. Yes.</p> <p>12 Q. But even though you had those concerns, you</p> <p>13 still went forward with a conference in Alberta in</p> <p>14 which you introduced the coin or the token, promoted</p> <p>15 its sale to friends and relatives; correct?</p> <p>16 A. Yes, I did.</p> <p>17 Q. Now, you said that when you had this March</p> <p>18 meeting then, or conversation you listened into with</p> <p>19 the ASC, that you believe the officer, the person,</p> <p>20 investigator, offered an opinion that the -- selling</p> <p>21 the coins and/or the shares could be considered a</p> <p>22 violation of the securities laws, both those things?</p> <p>23 A. He was quite firm that the offering us,</p> <p>24 taking of our money for shares in a company that not</p> <p>25 yet had been formed, that was definitely a violation,</p>

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<p>1 and, in his opinion, the coins were dubious.</p> <p>2 Q. Okay. Now, you say here in your answer to</p> <p>3 the interrogatory, "ASC advised that we should let our</p> <p>4 other investors know Marcus was not registered to sell</p> <p>5 securities."</p> <p>6 That's the first part.</p> <p>7 A. Yes.</p> <p>8 Q. Did that -- so that's based upon -- they</p> <p>9 weren't investors in the company, you said. So that's</p> <p>10 based upon an opinion of ASC, the ASC officer, that the</p> <p>11 coins were dubious?</p> <p>12 A. No, that is not correct. The investors I am</p> <p>13 talking about there are the two investors I contacted,</p> <p>14 Tyler Hoff and Darren Wincura.</p> <p>15 Can you hang on for a second. I need the</p> <p>16 battery charger for the computer.</p> <p>17 Once again, we should let the other investors</p> <p>18 know I am talking about the two investors that we had</p> <p>19 found out that were offered a similar deal that we</p> <p>20 were, Tyler Hoff, Darren Wincura, and one other fellow</p> <p>21 that I didn't -- I believe was the baker from down</p> <p>22 south, Alberta, but I was not -- I didn't have as much</p> <p>23 information.</p> <p>24 Q. You contacted those three people, you or your</p> <p>25 husband?</p>	<p>1 the large law conference was going to be, and he was</p> <p>2 going to blow that conference up. And I specifically</p> <p>3 told him not to do that, that I cannot guarantee that</p> <p>4 he was a fraud, that this is just the advice I'm giving</p> <p>5 him, and I wanted him to protect his investment.</p> <p>6 That's all I told them.</p> <p>7 Q. You told him you felt you needed to protect</p> <p>8 the investment. And you told him, didn't you, also,</p> <p>9 about this opinion of the officer of the ASC, that the</p> <p>10 coin sale could also be a problem?</p> <p>11 A. I don't think so. That I don't -- I truly do</p> <p>12 not think so. I know that Darren Wincura asked me</p> <p>13 about the coins and I told him, Darren, you need to</p> <p>14 contact them again. I'm still hoping -- in March, and</p> <p>15 I have other emails, we were being contacted still and</p> <p>16 I encouraged people to do whatever they -- to call the</p> <p>17 office, that this still could be -- I never criticized</p> <p>18 the coins verbally to people. We were still trying to</p> <p>19 come to an agreement for ourselves. I didn't want to</p> <p>20 jeopardize their -- even if it was sold improperly, it</p> <p>21 still could have went live and they still could have</p> <p>22 redeemed their -- their coins and seen a return. Some</p> <p>23 of these people had put life savings into this. That</p> <p>24 was a serious concern that we did not jeopardize their</p> <p>25 investment.</p>
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<p>1 A. Yes, I contacted Darren Wincura and</p> <p>2 Tyler Hoff.</p> <p>3 Q. And you told them that Marcus was unlicensed</p> <p>4 and violating the law; right?</p> <p>5 A. No, I did not.</p> <p>6 Q. What did you tell them?</p> <p>7 A. I told them that Corey had contacted the ASC.</p> <p>8 And I was very clear to not tell them that Marcus was a</p> <p>9 scam or a crook. I said that we were informed that he</p> <p>10 was not able to sell securities and that you should not</p> <p>11 be giving money into a company for shares in a company</p> <p>12 that had not yet been formed. I was very -- pardon.</p> <p>13 Q. Go ahead. Finish?</p> <p>14 A. I was very clear to Tyler and Darren that I</p> <p>15 was not saying he was a crook, that it might be</p> <p>16 nothing. All I asked them to do was two things, call</p> <p>17 the ASC themselves, and/or go to a lawyer. And before</p> <p>18 they turn their money over, to have a contract with a</p> <p>19 very specific exit strategy and a buy and sell</p> <p>20 agreement detailing everything so they had some</p> <p>21 protection for their investment. That's what I told</p> <p>22 them.</p> <p>23 Q. Didn't you tell them not to do it?</p> <p>24 A. No, I never, ever told them. Darren Wincura</p> <p>25 told me that he was going to go to Kent, Chicago, where</p>	<p>1 Q. People did see a return on the ultimate coin,</p> <p>2 some people did; correct?</p> <p>3 A. I believe so. I don't know.</p> <p>4 Q. You didn't solicit investments from Wincura</p> <p>5 and the other two investors yourself; right?</p> <p>6 A. No, I did not.</p> <p>7 Q. Your husband didn't?</p> <p>8 A. No.</p> <p>9 Q. And at the time you had this conversation or</p> <p>10 he did with the ASC and then you reached out to these</p> <p>11 people, you weren't still -- you and your husband --</p> <p>12 were you still officers or acting as officers?</p> <p>13 A. Well, we were never terminated but Marcus</p> <p>14 locked us out of the company and refused to allow</p> <p>15 anybody to talk to us.</p> <p>16 Q. Prior to that call you had with Wincura and</p> <p>17 the other person; right?</p> <p>18 A. Pardon?</p> <p>19 Q. The lockout was prior to the conversation you</p> <p>20 had with Wincura where you were informing him about the</p> <p>21 ASC's --</p> <p>22 A. Yes.</p> <p>23 Q. Why at that point, that you were no longer</p> <p>24 working for the company, would you go ahead and make a</p> <p>25 disclosure like that to a party you didn't even have a</p>

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<p>1 connection with?</p> <p>2 A. Mr. Olsen, I'm a housewife. I'm a mom of 12,</p> <p>3 and I've home-schooled them. And we go to church.</p> <p>4 When you have an officer of the law -- sorry -- inform</p> <p>5 you that you could have been -- that it was likely that</p> <p>6 you were participating in an illegal action, that is a</p> <p>7 heavy responsibility, in my opinion. In good</p> <p>8 conscience, I could not let Tyler Hoff or</p> <p>9 Darren Wincura proceed.</p> <p>10 I had met Tyler at the conference. He's an</p> <p>11 oil field worker. Most of Alberta is made up of</p> <p>12 blue-collar workers. I knew how much he had put in and</p> <p>13 how much of that life savings it was to the coins.</p> <p>14 When I heard the ASC say that, it was devastating.</p> <p>15 He also was very clear, in my opinion, that</p> <p>16 we could be held legally responsible if we didn't. To</p> <p>17 my opinion, if an officer of the law tells you to slow</p> <p>18 down, it doesn't matter what the speed sign is. It's</p> <p>19 not a suggestion. It's an expectation.</p> <p>20 Q. This person at the ASC, whether it was an</p> <p>21 officer of the law or whoever he was, did the person</p> <p>22 say that you had potential liability for the sale of</p> <p>23 these interests to third parties?</p> <p>24 A. Yes, he did.</p> <p>25 Q. He did. Which part, the shares or the coins?</p>	<p>1 MR. KNECHT: Objection to form.</p> <p>2 BY MR. OLSEN:</p> <p>3 Q. I'm sorry, what did you say?</p> <p>4 A. I said, I object to that. I called them</p> <p>5 once. That is not constantly contacting someone. And</p> <p>6 I was very clear that I was not suggesting that it was</p> <p>7 fraud and that I was only asking them to do due</p> <p>8 diligence.</p> <p>9 Q. On a deal that they had done before and to</p> <p>10 document a deal they had already done before; right?</p> <p>11 A. No, they had not. Previously, they were only</p> <p>12 coin holders, which has a purchase agreement, which has</p> <p>13 paperwork to fill out. It was only concerning the fact</p> <p>14 that Marcus had told us they were going to bring in</p> <p>15 Darren Wincura and Tyler Hoff in a similar situation as</p> <p>16 to what we had, that he was offering them a certain</p> <p>17 percentage of shares of the upcoming company not yet</p> <p>18 formed for an amount of money. Not one of Marcus'</p> <p>19 officers or partners had any kind of agreement or</p> <p>20 written paper, which we found that out in January as</p> <p>21 well.</p> <p>22 Q. Is that required?</p> <p>23 A. Would you do -- would you do legal work for</p> <p>24 someone that didn't have a contract with you?</p> <p>25 Q. I've done it many times. My question though</p>
Page 62	Page 64
<p>1 A. The coins.</p> <p>2 Q. Okay. So his opinion was it could be a</p> <p>3 problem, and you could have liability and so,</p> <p>4 therefore, you assumed you had liability and decided</p> <p>5 you'd make some calls. Is that how it went?</p> <p>6 A. He also was very clear that the selling of</p> <p>7 shares -- taking of money for shares in a company not</p> <p>8 yet formed was a violation and was illegal.</p> <p>9 Q. But you didn't do that?</p> <p>10 A. No, but that's how we had gotten involved.</p> <p>11 And I knew that more than likely, that was the offer</p> <p>12 Marcus had given them, which is why --</p> <p>13 Q. Go ahead.</p> <p>14 A. -- which is why I was very careful to simply</p> <p>15 ask to encourage them whole-heartedly to have a lawyer</p> <p>16 draw up the sale agreement or the investment agreement</p> <p>17 so that they had actual collateral and that there was a</p> <p>18 buy and sell agreement out, that they had a way to</p> <p>19 protect themselves.</p> <p>20 Q. But you didn't do the sale, you didn't do the</p> <p>21 agreement, you didn't know what the agreements were,</p> <p>22 and by constantly contacting them, it suggests that</p> <p>23 there was something wrong with their agreements; right?</p> <p>24 MR. KNECHT: Objection to form.</p> <p>25 THE WITNESS: I object to that.</p>	<p>1 is is that required? You don't know whether that's</p> <p>2 required or not?</p> <p>3 A. In good business it is. In an ethical</p> <p>4 situation it is.</p> <p>5 Q. By the law?</p> <p>6 A. I'm -- like I said, I'm a housewife. I don't</p> <p>7 know. I can only go by what I deem to be ethically and</p> <p>8 morally required of me, which is what I did.</p> <p>9 Q. Including talking to third parties to make</p> <p>10 them aware of the opinions of the Alberta Securities</p> <p>11 Commission?</p> <p>12 A. Yes. And, in my opinion, it was not an</p> <p>13 opinion. This is their job. If a doctor tells me that</p> <p>14 I probably have cancer, I probably have cancer.</p> <p>15 Q. So in this scenario, to take your analogy</p> <p>16 through, Doctor, this is how I feel, do you think I</p> <p>17 have cancer, and he says you probably do?</p> <p>18 A. I do not think it was the same thing.</p> <p>19 MR. KNECHT: Objection. Argumentative.</p> <p>20 BY MR. OLSEN:</p> <p>21 Q. You don't know whether you've ever had a</p> <p>22 conversation with Melissa Foteh?</p> <p>23 A. Pardon me? Which one was that again?</p> <p>24 Q. This is number 3. It's on the next page,</p> <p>25 BJodoin0087.</p>



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<p>1 A. Okay. No. To the best of my ability, I have 2 never talked to her. 3 Q. Has your husband? 4 A. I don't know. 5 Q. You have never communicated with 6 Jack Abramoff, but has your husband? 7 A. No. 8 Q. You have never communicated with Ralph Horn, 9 but has your husband? 10 A. Did you say Horn? 11 Q. Horn. 12 A. In the interrogatory, it's Hone. 13 Q. Well, in the answer it's Horn. And maybe it 14 is in the interrogatory. But have you ever had a 15 conversation with Ralph Horn, H-O-R-N? 16 A. I believe Ralph Horn was a coin holder. And 17 if that is the man that I am thinking of, I did call 18 him in December or email him in December, introduce 19 myself. If I talked to him personally, I don't know. 20 I called and interviewed -- I called and introduced 21 myself to all the coin holders. And I sent him an 22 email inviting him -- if he lives in Canada, he was 23 sent an email to be invited to the wine and cheese. 24 But I looked up Ralph Hone. I do not know Ralph Horn. 25 I believe he is a coin holder, but I was not given that</p>	<p>1 brought a company to some kind of -- I don't exactly -- 2 I think he was involved in some kind of Bitcoin or coin 3 operation. He was from London. Marcus really wanted 4 to get his expertise. He had asked me to arrange a 5 meeting with him via email in December in London. The 6 comments I have here, all I remember that Carl -- that 7 is all I can remember of the gist of the conversation 8 when we were in London. 9 Q. Did Carl say anything to you about Marcus? 10 A. No. The three of us met him together. And 11 after that, I never had any contact with him again. 12 Q. And what was discussed at the meeting? Was 13 it just these things here that are in the 14 interrogatory? 15 A. There was -- it was a fairly lengthy 16 conversation. At the time, I didn't understand much of 17 it. I knew very little about Bitcoin or Aten coin when 18 we first started. What really stuck out is the methane 19 market because it was about pigs. That's why I 20 remember the specific. I grew up in the country. I 21 just thought it was funny that you would attach a token 22 to the methane market. 23 Q. Was your husband there at that meeting? 24 A. Yes, he was. 25 Q. Where did you grow up?</p>
Page 66	Page 68
<p>1 name until right now. 2 Q. Richard Naimer, you've never communicated 3 with him. Has your husband? 4 A. I don't know. 5 Q. How about Louisa Murray? 6 A. No. 7 Q. Concerning Carl Weir, and we can take a break 8 after I ask questions about Carl, but you said in 9 response to the question whether you had ever had 10 communications with him concerning NAC or Marcus, you 11 said, "The only communication I had with Carl was 12 possibly a few emails and a meeting in London in or 13 about November or December of 2015." 14 A. Yes. 15 Q. So it also says, "All I remember is that Carl 16 thought it would be a good idea to attach the token to 17 a methane market or some other type of energy market. 18 Generally, I think there was a discussion about how to 19 increase the demand for Aten coin. I emailed Carl 20 before the meeting about the parameters of the 21 meeting." Et cetera. 22 So who was Carl Weir? 23 A. Carl Weir was a fellow that Marcus brought to 24 our attention and that informed us that he wanted to 25 bring on board. He was a name, had successfully</p>	<p>1 A. I was born in Rapid City, South Dakota. My 2 dad was a Vietnam vet. After he came back in '75, we 3 moved to Canada. I've lived most of my life in 4 Alberta, Canada. 5 Q. Do you know if your husband has ever had a 6 communication with Lisa Tippet? 7 A. No, I do not. 8 Q. Maurice Musiitwa? 9 A. Yes. 10 Q. You said that you recognized the name 11 potentially as someone who completed the NAC website? 12 A. Or some type of graphics design. 13 Q. Was he a coin holder? Do you know whether he 14 was? 15 A. No. If this is the gentleman I am thinking 16 of, he was a graphic designer on the web, where you 17 could go and put out a contest and whoever won the 18 contest, you would agree on a certain amount of money 19 and they would do graphic designs for you. I believe 20 he was African, if this is the gentleman I am thinking 21 about. 22 Q. African, but he lived in the United States, 23 this gentleman? 24 A. No. To my knowledge, the person that I'm 25 thinking about, I thought he lived in Africa because of</p>

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<p>1 the time difference when I needed to communicate with</p> <p>2 him, it didn't -- that is news to me. I thought he was</p> <p>3 African living in Africa.</p> <p>4 MR. OLSEN: Let's take a five-minute break,</p> <p>5 if we could.</p> <p>6 MR. KNECHT: Okay. Sounds good.</p> <p>7 (Whereupon, a recess was taken.)</p> <p>8 BY MR. OLSEN:</p> <p>9 Q. Mrs. Jodoin, I did want to clear something</p> <p>10 up. And this may have been the result of my</p> <p>11 questioning. But the first cryptocurrency was the Aten</p> <p>12 coin. That was the Aten coin you had?</p> <p>13 A. Yes.</p> <p>14 Q. The Aten coin was -- I talked about tokens.</p> <p>15 The Aten coin was a completed product, though; right?</p> <p>16 It was a completed coin?</p> <p>17 A. Yes, I believe it did go live after we --</p> <p>18 after we left. But it didn't perform very well.</p> <p>19 Q. Well, putting that aside -- it's a tough</p> <p>20 market. But the coin went -- you think the coin went</p> <p>21 live before you left or after?</p> <p>22 A. I want to say it was after.</p> <p>23 Q. Okay. Just for the record, is there a</p> <p>24 distinction between a completed product and a coin</p> <p>25 going live? Is there some interim stage?</p>	<p>1 A. No. To be honest, investment is more my</p> <p>2 husband's point so you would have to clarify the steps</p> <p>3 with him to make sure that I have this accurately, but</p> <p>4 from what I understood from us personally, we signed a</p> <p>5 purchase agreement for a certain amount of tokens,</p> <p>6 which would be put into our account as coins. They</p> <p>7 would be able to be mined or any of those things, but</p> <p>8 untraded. And then you would sign a purchase</p> <p>9 agreement. You would send the money to the office.</p> <p>10 Once the wire was received, that they would then ask</p> <p>11 you to identify -- to go through the identification</p> <p>12 verification process. And then Sachin would call you</p> <p>13 to get a wallet downloaded onto your computer. And</p> <p>14 then they would transfer a certain amount of tokens or</p> <p>15 coins to your wallet.</p> <p>16 Q. Okay. Do you know at what point they were</p> <p>17 tokens versus coins?</p> <p>18 A. It was used pretty much freely together when</p> <p>19 the group -- when the team was together, we called them</p> <p>20 coins because that's what we were going forward. Even</p> <p>21 in January when we were selling -- when the</p> <p>22 presentation to the investors, like the coin purchasers</p> <p>23 were given, they were given as tokens mainly to make</p> <p>24 sure they understood that it could not be live traded</p> <p>25 yet.</p>
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<p>1 A. Yes. When I say that it went live, that's</p> <p>2 when you could trade it for an American dollar or a</p> <p>3 Bitcoin or another, like, Lykke or any one of the other</p> <p>4 cryptocurrencies. That's what I meant -- that's what I</p> <p>5 understood when you said, did it go to fruition.</p> <p>6 Q. But it's a completed, I guess you could call</p> <p>7 it a product, but it's in a different stage than just</p> <p>8 an evolving token at some point and then it goes live</p> <p>9 by being on the market; is that fair to say?</p> <p>10 A. That wouldn't be how I would understand it.</p> <p>11 In my opinion, you can't claim to be a currency until</p> <p>12 somebody is trading in you.</p> <p>13 Q. Is there an ID verification process involved</p> <p>14 in the coin side of this?</p> <p>15 A. There was, yes.</p> <p>16 Q. And at what point -- did you go through that</p> <p>17 process?</p> <p>18 A. Yes, we did.</p> <p>19 Q. Okay. At what point did you do that?</p> <p>20 A. You mean us personally?</p> <p>21 Q. Yeah. When did you do that? I don't mean</p> <p>22 just in -- well, perhaps in time you could tell me when</p> <p>23 in time that happened, but also at what stage. So you</p> <p>24 buy coins; right? And then you go through the ID</p> <p>25 verification process at a later point; correct?</p>	<p>1 Q. Right. And you also mentioned that -- you</p> <p>2 said "investment" a few times, but just to be clear,</p> <p>3 you referred to the purchase agreement. The</p> <p>4 acquisition of coins is by a purchase technically, not</p> <p>5 an investment; correct?</p> <p>6 A. That is correct. That is correct. I</p> <p>7 apologize. That is my miss -- most of the people there</p> <p>8 were -- it was a risky investment opportunity.</p> <p>9 Everyone knew you were purchasing tokens in the hope</p> <p>10 that it would go live and it would equate in value. It</p> <p>11 was not an investment like a stock or a bond.</p> <p>12 Q. Let's switch from that to the IPO again. I</p> <p>13 just want to make sure we were clear on this. When</p> <p>14 there was this discussion about the IPO and going to</p> <p>15 the Australian market -- that was the eventual</p> <p>16 discussion, going to Australia; correct?</p> <p>17 A. Yes.</p> <p>18 Q. That's a different thing than a purchase of</p> <p>19 coins; correct?</p> <p>20 A. That is correct.</p> <p>21 Q. And that is more the typical investment we</p> <p>22 would say in a stock. And there's a process by which</p> <p>23 the company, NAC, went through to determine the best</p> <p>24 venue for an IPO; is that right?</p> <p>25 A. Um-hum. Yes.</p>



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<p>1 Q. Your husband was in charge of that process,</p> <p>2 with consultation, but he was in charge of that process</p> <p>3 at one point; correct?</p> <p>4 A. No.</p> <p>5 Q. He wasn't in charge of it or he wasn't</p> <p>6 involved in it?</p> <p>7 A. He was not in charge. When we got to Poland</p> <p>8 at the conference, we were invited afterwards to</p> <p>9 participate as viewers, in which James Mawhinney</p> <p>10 presented to the team the opportunity and the plan to</p> <p>11 take NAC to Australia. That was already established</p> <p>12 when we came in -- when we went there in October. That</p> <p>13 was the venue that Marcus had said that he had done due</p> <p>14 diligence and that was the market that was most viable</p> <p>15 for NAC.</p> <p>16 What Corey was put in charge of was working</p> <p>17 with James after the contract was signed to get -- to</p> <p>18 be the liaison or the -- to give James whatever he</p> <p>19 needed as the COO.</p> <p>20 Q. To actually -- sorry. Go ahead.</p> <p>21 A. I was just going to say once James Mawhinney</p> <p>22 withdrew or rejected, the team had multiple discussions</p> <p>23 about where we should then go. Aga suggested the</p> <p>24 Ukraine. Somebody said London. Somebody said -- it</p> <p>25 was a variety of choices. Marcus is the one that chose</p>	<p>1 Q. I want to go back. We may have forgotten</p> <p>2 about them, but the interrogatory answers, I'm looking</p> <p>3 at page BJodoin0091, Interrogatory 15. The</p> <p>4 interrogatory asks, "Please list the name of each</p> <p>5 person, aside from your attorney and the persons</p> <p>6 specified in Interrogatories 3 through 12, with whom</p> <p>7 you discussed NAC Foundation and/or Marcus between</p> <p>8 January 1st, 2015 and November 30th, 2019."</p> <p>9 And you offer up several pages here. You</p> <p>10 disclosed Marcus' personal contact information after</p> <p>11 you left to some people to say, you know, get in touch</p> <p>12 with Marcus if you want to find out what's going on or</p> <p>13 basically follow-up with Marcus. To whom did you give</p> <p>14 that personal contact information?</p> <p>15 A. I know that there was a previous coin, old</p> <p>16 owner, who called me, and he was quite angry. And he</p> <p>17 informed me -- I don't even remember his name. I</p> <p>18 didn't write it down. I apologize. He was quite angry</p> <p>19 because he wanted these coins to be going live. We had</p> <p>20 promised in January they would be going live right</p> <p>21 away. I told him I was no longer with NAC, and I said,</p> <p>22 please call the office. He said, I cannot get ahold of</p> <p>23 them. And I said, here is Marcus' phone number.</p> <p>24 Contact him.</p> <p>25 Q. Who else did you give Marcus' phone number</p>
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<p>1 London for the second opportunity.</p> <p>2 Q. With respect to, to Corey's duties, part of</p> <p>3 those duties where they were going to do it was to</p> <p>4 shepherd the IPO ahead, at least as long as he was</p> <p>5 there, to appoint where it could happen; right? Do you</p> <p>6 understand what I mean by that?</p> <p>7 A. Yes. Well, are you saying that he was</p> <p>8 responsible for the overseeing of it?</p> <p>9 Q. Yeah, essentially, with input from everybody,</p> <p>10 the group. But he was tasked as the COO with sort of</p> <p>11 making it -- getting it from the point where it was</p> <p>12 when he came in, hopefully, to an actual initial public</p> <p>13 offering; correct?</p> <p>14 A. Corey was the person James was to talk to and</p> <p>15 Corey would then go back to Marcus. Marcus would make</p> <p>16 the decisions and Corey would go back to James.</p> <p>17 Q. How about when James was gone?</p> <p>18 A. After that, Marcus made the decisions where</p> <p>19 we would consider to go.</p> <p>20 Q. And --</p> <p>21 A. All of the team members proposed, but Marcus</p> <p>22 was the one that decided on London.</p> <p>23 Q. Once he decided, was Corey involved in trying</p> <p>24 to move that forward?</p> <p>25 A. No.</p>	<p>1 to?</p> <p>2 A. When we were selling coins, I'm sure that it</p> <p>3 was given to Andrea and Vince, I believe, had it.</p> <p>4 Other than that, I don't -- the only number that I have</p> <p>5 for him was the same number that we were given by</p> <p>6 Marc Diadamo by Marcus himself when we were in Poland.</p> <p>7 So I never gave them his personal home number. To me,</p> <p>8 it was just the number that was associated with Marcus.</p> <p>9 Q. Well, there was an office number; correct?</p> <p>10 A. Yes.</p> <p>11 Q. Is this the number you're talking about for</p> <p>12 Marcus' office number?</p> <p>13 A. No, it was his cell number.</p> <p>14 Q. Well, the office number was not the same</p> <p>15 thing as Marcus' cell number, was it?</p> <p>16 A. No, it was not.</p> <p>17 Q. So you gave some people his cell number?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And giving them the cell number, that</p> <p>20 was done without Marcus' permission; right?</p> <p>21 A. For the clients that called once we had left,</p> <p>22 absolutely.</p> <p>23 Q. How about for Andrea and Vince?</p> <p>24 A. I'm not sure.</p> <p>25 Q. You knew that there was a difference because</p>

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<p>1 the office number could be routed to Marcus, but the 2 office number, those calls were recorded; right? 3 MR. KNECHT: Objection. Calls for 4 speculation. 5 BY MR. OLSEN: 6 Q. You can answer. That was the standard 7 procedure, was to give the office number and not the 8 direct cell number; correct? 9 A. I don't remember ever being told not to give 10 them the cell number. 11 Q. Well, if it was going to route -- if it went 12 through the office and going to route to his cell 13 number, the only reason to give someone his cell number 14 to call directly would be to not go through the office; 15 right? 16 A. For these gentlemen that I said previously 17 that contacted me after, I'm pretty sure it was by 18 June, he had called the office numerous times. He had 19 called me more than once. And I did not pick up. I 20 wanted him to leave us alone. And it was Marcus' -- 21 it's their problem. 22 Q. Well, but it wasn't your number to give to 23 them; correct -- him? 24 A. No, it was not my number. 25 Q. And to the LeFevres, which we kind of glossed</p>	<p>1 numerous phone calls with the office and had contacted 2 Marcus. 3 Q. You told her you were interviewed by the FBI? 4 You told Andrea? 5 A. Yes. 6 Q. And you told her the content of that 7 discussion; right? 8 A. Not really. It was very general, that the 9 FBI was investigating Marcus and they asked to 10 interview us. 11 Q. And you told your good friend Andrea what you 12 said though; right? 13 A. Let me think. Not in any great particular 14 detail, I don't think. 15 Q. What do you remember telling her? 16 A. I remember telling her that we went to the 17 FBI and that I was scared out of my mind because I had 18 never been interrogated by any type of police officer 19 or interviewed by a police officer. I told her that we 20 gave her our side of the story, and I told her I hoped 21 that Marcus would be stopped from harming other people. 22 Q. So you implied that Marcus had harmed people, 23 including you; correct? 24 A. That is my opinion, yes. 25 Q. You also told, at some point, Andrea and/or</p>
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<p>1 over, you also gave them Marcus' cell number, which 2 simply avoids going through the recorded office call; 3 right? 4 A. I don't know. I know I gave it to the 5 customer that called me in June. I know that. 6 Q. The LeFevres are friends of yours; right? 7 A. Yes, they are. But I do not know -- I would 8 have to look back through my conversations with Andrea. 9 I don't know if she got it from us or if Marcus had 10 contacted her. Because there are clients that Marcus 11 would call and contact from his cell phone to discuss 12 the purchase of the coins. I do know that I believe 13 they have it. I don't know if it was from me. I don't 14 remember. 15 Q. But you do say in answer to interrogatory, 16 they're close friends and they were having trouble in 17 July 2016 receiving their coins; right? So what 18 happened is you gave them Marcus' cell; right? 19 A. We did not know that they were getting -- 20 having difficult with the coins. When we talked to 21 them in April, we explained we were no longer with NAC, 22 and that we were having difficulty. We did not discuss 23 NAC again until she came to us after they had already 24 been having difficulty to tell us they had decided to 25 ask for their money back. She told me she had been on</p>	<p>1 Vince your understanding or your view of what the 2 Alberta Securities Commission had told your husband; 3 right? 4 A. Correct. 5 Q. Would that include your version of the ASC's, 6 what you call their opinion, that the coin sales could 7 be a violation of the Securities Act? 8 A. Yes, I did. 9 Q. You stated that it was a violation; correct? 10 A. That I understood that it was, yes. That it 11 very well could be. I don't actually -- let me correct 12 myself. I have never, I don't think, told anybody 13 100 percent that it was. I told them that I was afraid 14 it was after hearing what they said, but I can't know 15 for sure and they did not say for sure it was. 16 Q. If we asked her in a deposition, is she going 17 to remember it that way or remember it more like, you 18 know, Brandi told me that it was a violation? 19 MR. KNECHT: Objection. Calls for 20 speculation. 21 BY MR. OLSEN: 22 Q. You may answer the question. 23 A. I don't know. 24 Q. Bert and Angie, they are relatives; correct? 25 A. That is correct.</p>

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<p>1 Q. You told them -- they're Corey's parents.</p> <p>2 You told them that you were interviewed by the FBI?</p> <p>3 A. Yes.</p> <p>4 Q. And when did you talk to them about that?</p> <p>5 A. When we went to Las Vegas for it.</p> <p>6 Q. August 2018?</p> <p>7 A. Um-hum.</p> <p>8 Q. And what did you say to them about that</p> <p>9 interview after it happened?</p> <p>10 A. Not much. That I was told to meet an FBI</p> <p>11 agent. That they were -- that Marcus was being</p> <p>12 investigated.</p> <p>13 Q. Unlike Andrea, you didn't tell them it was</p> <p>14 scary?</p> <p>15 A. Andrea is my best friend.</p> <p>16 Q. Then in your answer to interrogatories you</p> <p>17 say, "Bert and Angie are Corey's parents. They knew we</p> <p>18 were interviewed by the FBI. Bert and Angie lost a</p> <p>19 great deal of money in a Ponzi scheme approximately</p> <p>20 four months ago."</p> <p>21 I assume that's in 2019 sometime?</p> <p>22 A. Yes.</p> <p>23 Q. Does that, their losing money in a Ponzi</p> <p>24 scheme, have anything to do with Marcus or NAC? I'm</p> <p>25 not sure why that's in the answer.</p>	<p>1 ourselves. They were in a similar situation, that they</p> <p>2 had given money to a person who was promising a return</p> <p>3 and they did not get a contract or any specific buy or</p> <p>4 sell protection. That is what the conversation was</p> <p>5 about. The coins were never brought into the</p> <p>6 conversation.</p> <p>7 Q. And you told your in-laws that it was</p> <p>8 similar?</p> <p>9 A. It is similar in the fact that they gave</p> <p>10 money to someone that they are having a difficult time</p> <p>11 getting it back and they have no written documentation.</p> <p>12 Q. You told somebody that your contract dispute</p> <p>13 with NAC is like a Ponzi scheme?</p> <p>14 A. No, I did not. I don't even -- to be honest,</p> <p>15 I put in Ponzi scheme because I didn't know how to -- I</p> <p>16 don't even know what a Ponzi scheme is. I know that a</p> <p>17 Ponzi scheme is when somebody is cheated of money. I</p> <p>18 put a Ponzi scheme in there because I did not know how</p> <p>19 to write that they had been duped.</p> <p>20 Q. The -- just for one second, go back to</p> <p>21 Andrea. The coins that Andrea and her husband</p> <p>22 purchased, you were the person from whom they purchased</p> <p>23 them; right?</p> <p>24 A. Yes. We signed the purchase agreement, yes.</p> <p>25 Q. And did you sign the, I want to say, quality</p>
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<p>1 A. It was similar in the fact that they had</p> <p>2 given money to somebody who had a product or was</p> <p>3 promising a large -- a deal of some sort, and they did</p> <p>4 not get documentation or a contract protecting their</p> <p>5 money. It was very similar in the fact that we gave</p> <p>6 Marcus the money without having the contract or a</p> <p>7 buyout position, and they wanted to talk to us about</p> <p>8 what they should do.</p> <p>9 Q. Well, as far as the coins, you got the coins</p> <p>10 in your deal?</p> <p>11 A. I'm talking about the \$275,000 that we gave</p> <p>12 Marcus for shares in a company that did not exist.</p> <p>13 Q. The company certainly existed; right?</p> <p>14 A. The one that he was going to give us shares</p> <p>15 in did not.</p> <p>16 Q. So getting back to your in-laws, you</p> <p>17 understand the difference between a Ponzi scheme and a</p> <p>18 statement that it's possible that some sort of purchase</p> <p>19 of a thing, like coins, might be a violation of some</p> <p>20 securities law?</p> <p>21 A. That isn't what we were talking about. We</p> <p>22 did not talk about the coins. We talked about the fact</p> <p>23 that Marcus had promised us shares in a company that</p> <p>24 did not yet exist and we gave him money with no</p> <p>25 contract, no buy and sell agreement, no protection for</p>	<p>1 and assurance form, something like that, that was part</p> <p>2 of those transactions?</p> <p>3 A. I actually did not sign any of it, I don't</p> <p>4 think.</p> <p>5 Q. Did Corey?</p> <p>6 A. I'm not sure. I was not -- that was not</p> <p>7 under my jurisdiction. I didn't -- I had very little</p> <p>8 to do with that.</p> <p>9 Q. Okay. John and Cynthia Bokenfohr, you told</p> <p>10 them in March of 2016, that John said he was going to</p> <p>11 call NAC and inquire about the coins, and you said,</p> <p>12 "they were informed what the ASC told us."</p> <p>13 What did you tell them specifically, the</p> <p>14 Bokenfohrs?</p> <p>15 A. The same thing I told Andrea, the same thing</p> <p>16 we told everyone, that when we had called the ASC, that</p> <p>17 they informed us that Marcus and Marc Diadamo were not</p> <p>18 registered to sell securities, and that, in his</p> <p>19 opinion, the coin or token could be considered a</p> <p>20 security and it could be unlawful that it was being</p> <p>21 sold.</p> <p>22 Q. Okay. But the way you put it to the</p> <p>23 Bokenfohrs was that it was unlawful; correct?</p> <p>24 A. No, I did not. It was that it could be.</p> <p>25 They asked my opinion. I said, I don't know. I sure</p>

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<p>1 hope not. I hope that you can still realize a return.</p> <p>2 Q. The next person on this list is</p> <p>3 Chantal Ortmeier. It says you spoke to her in June of</p> <p>4 2016, and explained -- you said, "I explained that we</p> <p>5 were no longer with NAC. Chantal is my sister-in-law.</p> <p>6 She knows Marcus is suing us, that we had been refused</p> <p>7 our money and we went to Las Vegas to talk to the FBI."</p> <p>8 See that?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. When --</p> <p>11 A. May I clarify? I am not sure if it was June.</p> <p>12 It took us a fairly lengthy time to contact and share</p> <p>13 with all of the few coin holders that we personally had</p> <p>14 presented the opportunity to. As near as I can</p> <p>15 remember, it was later than the rest. It could have</p> <p>16 been earlier.</p> <p>17 Q. Well, if you told her you went to the FBI --</p> <p>18 to Las Vegas to talk to the FBI, was that after August</p> <p>19 of 2018?</p> <p>20 A. Yes. Well, she knew before. She knew before</p> <p>21 we were traveling down there. She's my sister-in-law.</p> <p>22 She knew that we were going down to the FBI. We needed</p> <p>23 someone to help watch the kids.</p> <p>24 Q. I was trying to get the timeline. So you</p> <p>25 talked about 2016, possibly later. But that event took</p>	<p>1 Q. Okay. The people at that conference bought</p> <p>2 coins, though; right? They didn't buy --</p> <p>3 A. That's correct.</p> <p>4 Q. I'm going to assume you told</p> <p>5 Angela McGonigal, when you told them about the ASC,</p> <p>6 your testimony is you told them the same things you</p> <p>7 told other people, and you've testified to that today?</p> <p>8 A. Yes.</p> <p>9 Q. However, when it comes to Tyler Hoff, and</p> <p>10 this is on page BJodoin0093, you say that you spoke to</p> <p>11 Tyler Hoff and to Darren, is it Wincura?</p> <p>12 A. Wincura, I believe.</p> <p>13 Q. You said that you talked to them between</p> <p>14 April 25th and May 2nd, 2016, after the ASC informed</p> <p>15 you -- "informed us we may be legally responsible if we</p> <p>16 did not inform them of what we had learned after</p> <p>17 talking to the ASC."</p> <p>18 I think we already talked about -- you go on</p> <p>19 to say, "I felt morally obligated to inform them."</p> <p>20 We've already talked about the fact that you</p> <p>21 felt a moral obligation, and it wasn't as though the</p> <p>22 ASC had told you directly you're criminally liable for</p> <p>23 this; correct? When you talked to Tyler --</p> <p>24 A. I want to answer your question.</p> <p>25 Q. Go ahead.</p>
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<p>1 place in 2018; correct?</p> <p>2 A. I apologize. I'm saying that the first part</p> <p>3 of all of these we spoke to them between March and end</p> <p>4 of June, first part of July. We told the people that</p> <p>5 we had sold coins to what the ASC said and that we were</p> <p>6 no longer with NAC. Then when we went to Las Vegas to</p> <p>7 talk to the FBI, Chantal was told that we were going to</p> <p>8 Las Vegas, and she would have been told that in August</p> <p>9 before we went down to Las Vegas.</p> <p>10 Q. Did she purchase her coins at the time you</p> <p>11 had the conference in January, I think it was, of 2016?</p> <p>12 A. Yes, within -- I don't know if she purchased</p> <p>13 them that night, but within -- from the result of that</p> <p>14 is when she purchased her coins, yes.</p> <p>15 Q. Okay. And we already discussed the fact that</p> <p>16 at the time the conference took place, you had</p> <p>17 already -- there had already been this change in</p> <p>18 expectations over the \$140 million, \$100 million</p> <p>19 discussions with Mawhinney, and so you had already gone</p> <p>20 through that process and already had some suspicions,</p> <p>21 didn't you, about NAC?</p> <p>22 A. I had suspicions about that it was not being</p> <p>23 run efficiently. I did not start to doubt the legality</p> <p>24 or the ethics of Marcus until after January, after the</p> <p>25 conference.</p>	<p>1 A. In my opinion, he made it very clear that we</p> <p>2 could be criminally liable and that we have an</p> <p>3 obligation.</p> <p>4 Q. Even though it was only his opinion with</p> <p>5 respect to the coins?</p> <p>6 A. Yes. And, actually, was not with respect to</p> <p>7 the coins. Once again, it was Tyler and Darren Wincura</p> <p>8 were giving money to purchase shares in a company that</p> <p>9 did not yet exist.</p> <p>10 Q. And, again, with respect to these two, you</p> <p>11 were not involved in their purchase, potential</p> <p>12 purchase, of shares, were you?</p> <p>13 A. Given what Marcus had informed us, no.</p> <p>14 Q. Right. So you didn't have any obligation or</p> <p>15 potential liability to speak to these people about a</p> <p>16 purchase of shares you were never involved with?</p> <p>17 A. The ASC said we were. Because he asked us</p> <p>18 when we explained how we would gotten involved and he</p> <p>19 informed us that that was a violation, Corey asked, he</p> <p>20 said, well, there's other people that are doing it,</p> <p>21 too. Or he asked, is there other people. That somehow</p> <p>22 it was brought up that did anyone else do it with you.</p> <p>23 And we said, no, but there are three prospective people</p> <p>24 that are being asked right now to do that. And he told</p> <p>25 us, he said, you know, you have an obligation to tell</p>



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<p>1 them. You could be criminally liable if you do not.</p> <p>2 You could be held responsible if we do not.</p> <p>3 Q. By the time of that conversation with the</p> <p>4 ASC, had you been locked out? Had you left, ended your</p> <p>5 association?</p> <p>6 A. Yes.</p> <p>7 Q. You had said you had been locked out. Those</p> <p>8 were your words. So that had happened already by the</p> <p>9 time of the ASC. So you were no longer -- whatever</p> <p>10 your position was, you no longer had that position and</p> <p>11 Corey no longer had that position; correct?</p> <p>12 A. That's correct.</p> <p>13 Q. Was there a -- do you know whether Tyler Hoff</p> <p>14 contacted the ASC?</p> <p>15 A. I do not know. His affidavit said he did</p> <p>16 not. That's all I know.</p> <p>17 Q. Right. His affidavit said -- disagreed with</p> <p>18 your characterization of the conversation you had;</p> <p>19 correct?</p> <p>20 A. Pardon me? Can you repeat that.</p> <p>21 Q. Mr. Hoff's affidavit disagreed with what</p> <p>22 you're telling me now. He said that you had accused,</p> <p>23 essentially accused, Marcus of fraud in that</p> <p>24 conversation; correct?</p> <p>25 MR. KNECHT: Objection. Document speaks for</p>	<p>1 A. Yes.</p> <p>2 Q. And you said it wasn't a false statement.</p> <p>3 But who did you tell that as part or all of your</p> <p>4 reliance, you relied upon a market valuation of</p> <p>5 \$100 million or more to make your investment?</p> <p>6 A. To be honest, I don't know. We were informed</p> <p>7 when we left and after we talked to the ASC and got</p> <p>8 legal counsel, we could -- we should tell as little to</p> <p>9 people as we could to not engage in discussions.</p> <p>10 However, some of these are our friends and family and</p> <p>11 we were angry.</p> <p>12 Q. So you were told you should contact some</p> <p>13 people, but you shouldn't give detail?</p> <p>14 A. No, that's not what I'm saying. When the ASC</p> <p>15 told us -- and I want to be clear. It's been five</p> <p>16 years. Listening to that conversation and hearing an</p> <p>17 officer of the law tell us that we could have been</p> <p>18 engaged in something that was illegal and we could have</p> <p>19 invited our family and friends into it, was extremely</p> <p>20 off-putting. I walked away with that very convinced</p> <p>21 that I could be held liable or responsible for not</p> <p>22 informing at least Tyler and Darren. The choice to</p> <p>23 tell the coin holders that the ASC said about the coins</p> <p>24 perhaps being -- we told our family and friends. We</p> <p>25 had used our good name to bring them into this and we</p>
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<p>1 itself.</p> <p>2 BY MR. OLSEN:</p> <p>3 Q. You can answer.</p> <p>4 A. I re-read it, and he doesn't say it exactly,</p> <p>5 but it definitely seems like he disagrees with me, yes.</p> <p>6 Q. And it also says that Corey actually provided</p> <p>7 the information. He texted the name and the number of</p> <p>8 the officer that he talked to from ASC in this answer;</p> <p>9 correct?</p> <p>10 A. That's correct.</p> <p>11 Q. As you sit here today, do you know that name?</p> <p>12 A. No. Can I clarify something?</p> <p>13 Q. Let me move on to a short question and we can</p> <p>14 get out of these interrogatory answers.</p> <p>15 A. Sure.</p> <p>16 Q. If you can look at number 16 on page</p> <p>17 BJodoin0094. It says, "Please state the name of each</p> <p>18 person listed in your response to Interrogatory 15" --</p> <p>19 which we went through -- "to whom you made the false</p> <p>20 statement about the NAC Foundation and/or Marcus,</p> <p>21 including, but not limited to, the statement that you</p> <p>22 relied on a market valuation of \$100 million when you</p> <p>23 decided to remit a total of \$265,000 to NAC, as you</p> <p>24 inferred in paragraph 41 of your counterclaim."</p> <p>25 You see that?</p>	<p>1 needed to be as honest as we could to why we were</p> <p>2 leaving.</p> <p>3 When we contacted a lawyer, they asked us to</p> <p>4 say as little as possible about it. I can't say for</p> <p>5 sure what I told my friends and family. I tried to say</p> <p>6 very little and stay very positive, but at the end,</p> <p>7 when we were locked out, it became very apparent that I</p> <p>8 cannot say I didn't share. I was angry.</p> <p>9 Q. Bear with me one second, find my notes here.</p> <p>10 I glossed over this so let me go back and ask you this.</p> <p>11 When I mentioned the quality assurance forms,</p> <p>12 what's the purpose of those forms?</p> <p>13 A. I don't know.</p> <p>14 Q. You signed one or several; right?</p> <p>15 A. I don't -- I don't know if I did or not.</p> <p>16 Corey -- I was responsible for organizing the events.</p> <p>17 And I was also trying to help pull policies and</p> <p>18 procedures to make up a corporate policy. Corey</p> <p>19 understood the coin better. He also has run his own</p> <p>20 business. So most of the sales he was responsible for</p> <p>21 the actual filling out of the paperwork.</p> <p>22 I do not remember filling out or signing one.</p> <p>23 I'm not saying I didn't. I would need to see them. I</p> <p>24 would suggest that most were done by Corey.</p> <p>25 Q. Okay. But you knew what they were? I mean,</p>

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<p>1 you had seen them; right? You might have signed 2 something, you might not have? 3 A. Yeah. When we bought our own coins, I 4 believe the quality assurance, if I am remembering the 5 paperwork properly, was that you were buying coins -- 6 it's to qualify, like you said earlier, it wasn't an 7 investment opportunity. It was you were buying tokens 8 that right now had no monetary value. I believe that's 9 what the quality assurance form was. 10 Q. Okay. And the idea that the person signing 11 them on behalf of the company was representing -- 12 A. Was stating that -- 13 Q. -- weren't being misled or anything -- 14 A. Yeah, it's not money. I'm not selling you 15 \$100 worth of American coins, yes. 16 Is that what it was? Is that the right 17 paper? 18 Q. You'll have to take a look at afterwards. 19 A. Okay. 20 Q. One more thing on the FBI. Maybe I asked you 21 this, but did you, yourself, send any subsequent 22 documents? You said that you had documents there for 23 them to look at, give them access, during the 24 interview. Did you send anything subsequent to the 25 interview?</p>	<p>1 Do you recall? 2 A. Oh, C-A-L. 3 Q. Maybe I got it wrong. The money -- 4 A. Okay. Okay. Yes, that is -- now, let me see 5 if I can remember. This is stuff I learned. One of 6 the things about Aten coin was that it was AML 7 compliant. It was also to use the same software the 8 American banks do, which was to prevent fraudulent use 9 of the coin. There was also a form that we implemented 10 or a procedure that we had to prevent money laundering. 11 And there was countries, I believe, that we were not 12 willing to sell to. That might have been because they 13 were wanting to not fund terrorist activities. 14 Q. Right. Did an officer or someone on behalf 15 of NAC sign those forms as well as the buyer? 16 A. I believe so. 17 Q. Did you sign any? 18 A. I don't know. 19 Q. Have you ever discussed, been contacted by or 20 contacted yourselves, the Internal Revenue Service in 21 the United States concerning NAC or Mr. -- 22 A. No. 23 Q. Has the -- had the FBI ever mentioned that to 24 you? 25 A. Not that I recall.</p>
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<p>1 A. I believe I did. I believe that we had some 2 extra copies of some of the emails on our computer. 3 And I believe I forwarded a shore bit (phonetic) or I 4 forwarded them to Adam. 5 Q. For the purpose of getting them to the FBI? 6 A. Yes. I believe it was about the lobbyist. 7 Q. Abramoff? 8 A. Is he the black fellow? 9 Q. No, definitely not. 10 Do you recall who the -- what was this 11 lobbyist for? What was he doing? 12 A. He was a lobbyist trying to get Congress to 13 pass a law stating that cryptocurrency had to be AML 14 compliant. And he was an African American fellow. 15 Q. Okay. Do you know who Jack Abramoff is? Did 16 you ever hear about his affiliation with the company? 17 A. Only after you sent the name to me. I 18 Googled him. 19 Q. Do you know if he had any relationship to 20 this gentleman you're thinking of? 21 A. I have no idea. The lobbyist I never met or 22 contacted. That was Corey and Marcus. 23 Q. Can you tell me what the C-A-L-E form is? 24 A. I don't know. 25 Q. Has something to do with money laundering.</p>	<p>1 Q. Have you ever signed a written statement or 2 affidavit for either the FBI or the ASC? 3 A. No. 4 Q. Were you asked to? 5 A. No. 6 Q. How about for any other agency? 7 A. No. 8 Q. What did you understand your job as the 9 administrative officer to be? 10 A. A girl Friday. I was to oversee, help 11 Agnieszka Bilinska with the market -- marketing plan. 12 If she needed any help, to help her with that. I was 13 to help edit and oversee the website and the graphic 14 designs. 15 When we were to be going towards, with 16 James Mawhinney, we had corporate structure. So I was 17 supposed to be pulling corporate structure together, 18 working with Aga to do corporate structure. 19 When I was also placed in -- all the Canadian 20 customers I was supposed to introduce myself to and ask 21 them to come to the investment wine and cheese. There 22 was some difficulties with everyone getting their 23 wallet downloaded. They were asked to call us if we 24 had any -- to see if we could answer some of those 25 questions first, and if not, I was supposed to pass it</p>



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<p>1 on to Patti or Barb at the office.</p> <p>2 When we were in Las Vegas and I discovered</p> <p>3 the state of the files, Marcus had said I was to</p> <p>4 contact the Canadian customers and rectify the</p> <p>5 paperwork issues.</p> <p>6 Q. That was in that January visit to the office?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. You mentioned the oversight for</p> <p>9 marketing, Agnieszka Bilinska and then the lawyer whose</p> <p>10 name was escaping me.</p> <p>11 A. The lawyer was called Aga.</p> <p>12 Q. Okay. So Agnieszka or Agnes, I'll call her,</p> <p>13 she was doing work on the marketing and you were</p> <p>14 overseeing her preparation of the marketing materials,</p> <p>15 including for the Alberta conference; correct?</p> <p>16 A. Yeah. We were more or less just working</p> <p>17 together.</p> <p>18 Q. And that was not just graphics, but that was</p> <p>19 the content that was put into that presentation; right?</p> <p>20 A. No. We were to critique the way it looked,</p> <p>21 color and design and what not. Each one was given a</p> <p>22 specific -- each one of the presenters were given a</p> <p>23 specific task. And they accumulated theirs and then</p> <p>24 sent it to us for layout and look. And then Marcus</p> <p>25 critiqued whether or not something was allowed to be</p>	<p>1 asking you wrote some of it and then you were the one</p> <p>2 who put it up on the site?</p> <p>3 A. No, I don't have technical expertise for</p> <p>4 that.</p> <p>5 Q. I did say that wrong. You wrote some, and</p> <p>6 then you instructed whoever actually had the technical</p> <p>7 expertise to put it up on the site?</p> <p>8 A. Yes. After Marcus gave me his approval.</p> <p>9 Q. Okay.</p> <p>10 A. I did not make a decision ever without</p> <p>11 Marcus' approval.</p> <p>12 Q. You've mentioned Aga?</p> <p>13 A. Yes.</p> <p>14 Q. Cenzartowicz, I think?</p> <p>15 A. Yes.</p> <p>16 Q. She's a lawyer educated in the U.S., as I</p> <p>17 understand it?</p> <p>18 A. Yes.</p> <p>19 Q. What were her responsibilities at NAC?</p> <p>20 A. She, in December, when we -- December, when</p> <p>21 we were in Poland, we were informed that Aga was</p> <p>22 responsible for all the European legal work. She was</p> <p>23 also supposed to get half of Aten Pay, I believe, or a</p> <p>24 quarter of Aten Pay. So she did all of the legal work</p> <p>25 there. When we were trying to put together a corporate</p>
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<p>1 said. Like, for example, Terence at the Polish</p> <p>2 conference gave a very good presentation on crypto</p> <p>3 crime, but his PowerPoint was black with red writing</p> <p>4 and it was hard to read. So we told him he should</p> <p>5 switch the colors. Not so much content. We just got</p> <p>6 them to switch colors.</p> <p>7 I ordered the business cards. I talked to</p> <p>8 the caterer.</p> <p>9 Q. Documents that went out of the office, during</p> <p>10 the time you were doing these things, documents that</p> <p>11 went out of the office to coin holders, those went</p> <p>12 through you; correct?</p> <p>13 A. Documents, as far as invitations went out. I</p> <p>14 introduced myself. The 18 coin holders that were</p> <p>15 missing legal parts of their purchase agreements and</p> <p>16 compliance, I contacted them to tell them that they</p> <p>17 needed to -- and I worked with Marc Diadamo to</p> <p>18 encourage him to get these up to date.</p> <p>19 Q. You mentioned the website. You put certain</p> <p>20 material up on the website as well; correct?</p> <p>21 A. Like, the content of it?</p> <p>22 Q. Yeah.</p> <p>23 A. Are you asking if I'm the one -- I wrote some</p> <p>24 of the content.</p> <p>25 Q. I'm not asking if you wrote everything. I'm</p>	<p>1 structure for the NAC to go take it public, she was</p> <p>2 appointed chief legal officer. And then from that</p> <p>3 point, she was supposed to bring all of the various</p> <p>4 lawyers Marcus had doing various piecemeal work under</p> <p>5 her direction and she was supposed to oversee it.</p> <p>6 Aga and I also were the ones that were</p> <p>7 working on policies and procedures. I would pull</p> <p>8 policies and procedures from various online sites, and</p> <p>9 then I would forward to her and she would tell me if</p> <p>10 legally this was applicable or not.</p> <p>11 Q. Okay. So you would hunt for them. You would</p> <p>12 select things that you thought were appropriate, and</p> <p>13 then she gave it the lawyer's look to see if it met the</p> <p>14 legal criteria?</p> <p>15 A. Yes. For example, like, per diems when</p> <p>16 they're traveling, gifts given to you when you're</p> <p>17 working for a company, sick leave, that type of thing,</p> <p>18 I would find those corporate policies from various</p> <p>19 sources, and she would tell me which one would be the</p> <p>20 best one to use.</p> <p>21 Q. The best one or the one that was legally the</p> <p>22 best?</p> <p>23 A. Yes, legally the best. Legally the best.</p> <p>24 Q. When you were talking about Marcus giving</p> <p>25 approval on content, whether it was in presentations or</p>

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<p>1 the website, as I understood it, would he do that by</p> <p>2 email, he'd give his approvals?</p> <p>3 A. Some email, some email. Like large parts of</p> <p>4 the presentation were sent to him. We had wanted to</p> <p>5 put -- Jarek had asked Corey if he could put the asset</p> <p>6 valuation that was in the business plan that we had</p> <p>7 been given. Marcus said no, and asked him to remove it</p> <p>8 because he felt that you didn't want to tip your hand</p> <p>9 to too many people and reveal the worth of the company</p> <p>10 or what could be the worth of the company. And for</p> <p>11 those, that was done via email.</p> <p>12 We did a lot of Skype. Particularly with the</p> <p>13 website editing and graphics, we would go on Skype and</p> <p>14 I would send different graphics and different parts of</p> <p>15 it there. And then towards the end of the conclusion</p> <p>16 of the website, you could go on and it was like a</p> <p>17 non-live model. We could login to it and we could</p> <p>18 scroll through it as if it was a website, but nobody</p> <p>19 else could, if that makes sense.</p> <p>20 Q. Right. During the construction of the</p> <p>21 website?</p> <p>22 A. Yes. Yes. And then we would edit it via,</p> <p>23 you know, like, writing on the screen, type thing.</p> <p>24 Q. Did Marcus ever do that or did you just take</p> <p>25 that from, say, an email he sent you and you made</p>	<p>1 Agnieszka and just give him final approval. That</p> <p>2 originally was done on Gmail, on my Gmail. And then a</p> <p>3 few of the contacts with some of the clients. After</p> <p>4 that I told him I didn't want my personal email being</p> <p>5 used. It was very, very early that he set me up an</p> <p>6 Aten coin email.</p> <p>7 Q. You still have that personal email? Do you</p> <p>8 still use it?</p> <p>9 A. Yes, I do. I do.</p> <p>10 Q. Okay. Talking about approvals from Marcus,</p> <p>11 there are -- and I think this has been in association</p> <p>12 with either Alberta or possibly in the European</p> <p>13 conference, but there are a bunch of bios I've seen</p> <p>14 prepared.</p> <p>15 A. Yes. Yes.</p> <p>16 Q. Those were done for the Alberta conference?</p> <p>17 A. Yes.</p> <p>18 Q. And those were done, I gather, by the</p> <p>19 individuals?</p> <p>20 A. The basic -- I apologize. Please continue.</p> <p>21 Q. That's okay. I was lingering there.</p> <p>22 Did you modify those based on information?</p> <p>23 A. No, I didn't. I was responsible for</p> <p>24 collecting it. And then it went through Agnieszka</p> <p>25 Bilinska. And then I believe her name was Lisa</p>
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<p>1 edits?</p> <p>2 A. We did it both. And, actually, we sent it to</p> <p>3 Aga and Agnieszka and Corey as well. And they all had</p> <p>4 various opinions on it. We would also do some stuff on</p> <p>5 Google Docs. There was a couple things Aga had sent to</p> <p>6 me that I would respond, this seems odd or this is</p> <p>7 worded incorrectly, what about this. And then Marcus</p> <p>8 would join and say yes or no.</p> <p>9 Q. Those emails that you would exchange with</p> <p>10 Marcus about this kind of stuff, the content or</p> <p>11 anything else, you still have copies of those emails</p> <p>12 somewhere?</p> <p>13 A. Pardon me?</p> <p>14 Q. That was a sneeze.</p> <p>15 A. Okay. I have certain copies that I printed</p> <p>16 off. It was an Aten coin email. As soon as it got</p> <p>17 shut down, we were completely locked out of it.</p> <p>18 Q. Did you use your personal email address for</p> <p>19 any of these exchanges?</p> <p>20 A. In the beginning, I did, for a few things</p> <p>21 when -- NAC was a member of the American Bankers</p> <p>22 Association, ABA. And they were wanting promotion</p> <p>23 materials for -- in the ABA, if you join, you get a</p> <p>24 banner page and you get some of that information.</p> <p>25 Marcus asked me to take that over and work with</p>	<p>1 Hafeeler (phonetic). She was a marketing woman out in</p> <p>2 New York. She set up our LinkedIn account, Corey and</p> <p>3 I. And she also was responsible for the writing of the</p> <p>4 biographies.</p> <p>5 Q. Right. Corey wrote his biography; correct?</p> <p>6 A. No. He wrote, like, a thumbnail and Lisa --</p> <p>7 Lisa wrote it.</p> <p>8 Q. Thumbnail being, like, well, this is my</p> <p>9 experience and this is how I've been doing this, and</p> <p>10 she filled in the other stuff?</p> <p>11 A. She made it pretty.</p> <p>12 Q. Okay. How about yours? Because I saw you</p> <p>13 had one. You wrote the basic fact points and she made</p> <p>14 it pretty?</p> <p>15 A. I just gave the basic facts. I didn't really</p> <p>16 recognize myself when she was done, to be honest.</p> <p>17 Q. What was it you didn't recognize?</p> <p>18 A. It made me sound much better than a</p> <p>19 housewife. Then they had to be given to Marcus to be</p> <p>20 okayed. And then they were sent back to me and I sent</p> <p>21 them to the printer.</p> <p>22 Q. Okay. Before it went to the printer, you saw</p> <p>23 them, the bios; correct?</p> <p>24 A. That is correct.</p> <p>25 Q. You saw yours?</p>

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<p>1 A. Yes.</p> <p>2 Q. And you sent that one and the others out to</p> <p>3 the printer to be made part of a package?</p> <p>4 A. First I sent them to Marcus for approval.</p> <p>5 And then once he approved it, then I sent them to the</p> <p>6 printer, yes.</p> <p>7 Q. Okay. Did you ever delete any emails -- you</p> <p>8 mentioned the company emails. Did you ever delete the</p> <p>9 emails from your company email?</p> <p>10 A. Yeah. You get emails that -- I'm sure I</p> <p>11 probably did. Not -- can I start over? I did not ever</p> <p>12 delete emails with the intention of deleting them to</p> <p>13 erase the information. I would assume that there was</p> <p>14 some emails being deleted because they were simply</p> <p>15 unnecessary.</p> <p>16 Q. Okay. Since you say it that way, did you</p> <p>17 ever delete any that were not unnecessary?</p> <p>18 A. Not that -- no.</p> <p>19 Q. What sort of --</p> <p>20 A. Not with the intent.</p> <p>21 Q. Was there categories of emails you would</p> <p>22 delete, types of emails?</p> <p>23 A. There was a lot of ABA emails that were sent</p> <p>24 to you, we're having this special, we're having this</p> <p>25 conference.</p>	<p>1 Q. Did you communicate with Mr. Fahy or just</p> <p>2 Corey?</p> <p>3 A. I believe that I was present on one phone</p> <p>4 call with John Fahy, where Marcus and Corey were</p> <p>5 talking to John Fahy concerning a judgment or an order</p> <p>6 against NAC from Florida. And then I emailed him once</p> <p>7 or twice. I emailed him once introducing Aga as the</p> <p>8 new legal officer.</p> <p>9 And then there was a confusion about the</p> <p>10 compliance policies. Aga went to John Fahy because she</p> <p>11 was just updating them, and Marcus informed her that</p> <p>12 John Fahy was supposed to do it all. And so John Fahy</p> <p>13 was received and I was CC'd in that email. I believe</p> <p>14 that's the only communication I had with him that I can</p> <p>15 remember.</p> <p>16 Q. Okay. It's likely, given what Corey was</p> <p>17 doing, that he worked more with John?</p> <p>18 A. I don't really think so. I think that much</p> <p>19 of what John had done was established prior to us going</p> <p>20 there. Aga was the point that we dealt most with.</p> <p>21 Q. Okay. How about there's a person named</p> <p>22 Jarek; correct?</p> <p>23 A. Jarek.</p> <p>24 Q. Jarek, sorry. Now that I'm seeing the last</p> <p>25 name, it's Jarek. What did Jarek do?</p>
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<p>1 Q. How about things that are to do specifically</p> <p>2 with the company as opposed to just junk, ads, that</p> <p>3 kind of thing?</p> <p>4 A. I can't think of anything. I tried to keep</p> <p>5 as much as I could and tried to keep it organized.</p> <p>6 There might be some emails concerning all the graphic</p> <p>7 design that were just getting too large that I cleaned</p> <p>8 up, but I do not believe so.</p> <p>9 Q. Does that include emails that relate to</p> <p>10 content of website presentation?</p> <p>11 A. Yes. I really don't believe so.</p> <p>12 Q. Let me ask you -- let's try and move on. I</p> <p>13 know it's getting late there. Let me try to move on to</p> <p>14 another topic.</p> <p>15 Do you know John Fahy? Do you know that</p> <p>16 name?</p> <p>17 A. John Fey?</p> <p>18 Q. F-A-H-Y.</p> <p>19 A. Yes. F-E-Y?</p> <p>20 Q. I thought there was an H. The person you're</p> <p>21 thinking of, what does he do?</p> <p>22 A. He's a securities lawyer that has done work</p> <p>23 prior to -- we were getting there and setting up,</p> <p>24 overseeing I don't remember what it's called for the</p> <p>25 coin sales.</p>	<p>1 A. Jarek was in the banking or insurance</p> <p>2 business. And he was brought on by Aga and Igor to</p> <p>3 help build the structure and the management of, like,</p> <p>4 business operations. And he was to be working with</p> <p>5 Corey on the fast payment, the Federal Reserve fast</p> <p>6 payment. And then they were to be working on a more</p> <p>7 comprehensive kind of company view of where we were</p> <p>8 going to be going forward at kind of a streamlined how</p> <p>9 we were going to develop Aten coin.</p> <p>10 Q. You mentioned Marc. What was Marc's role</p> <p>11 with the company?</p> <p>12 A. He was the salesperson that sold Corey the</p> <p>13 coins. And he was the head salesman and then he was</p> <p>14 given the VP of sales.</p> <p>15 Q. When you went to the office in Las Vegas in</p> <p>16 January of 2016, was Marcus there?</p> <p>17 A. Marcus?</p> <p>18 Q. Andrade.</p> <p>19 A. Yes, he was.</p> <p>20 Q. How about Diadamo?</p> <p>21 A. I do not believe so.</p> <p>22 Q. Okay. Was Corey there?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. There was a Federal Reserve payment</p> <p>25 task force thing that was in Chicago. Was Marc at</p>

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<p>1 that?</p> <p>2 A. I do not believe so. I know Corey went. I'm</p> <p>3 pretty sure that Marc was not there. Marcus or Marc?</p> <p>4 Q. Marc Diadamo.</p> <p>5 A. As far as I know, Marco was not there.</p> <p>6 Q. So Marco wasn't there, but the one shortly</p> <p>7 before even Las Vegas. And he wasn't in Las Vegas. Do</p> <p>8 you know why?</p> <p>9 A. I don't. I don't. I don't remember him</p> <p>10 being there. And the reason why I think he really was</p> <p>11 not because I then had to contact him about the missing</p> <p>12 purchase orders and compliance forms and the CAL forms</p> <p>13 that were missing out of his clients' files.</p> <p>14 Q. Why were they missing?</p> <p>15 A. Because they hadn't been done.</p> <p>16 Q. And so did you take charge at that point of</p> <p>17 doing them?</p> <p>18 A. I took charge of gathering of -- Patti and</p> <p>19 Barb were to go through each file, identify what was</p> <p>20 missing. Then they were to send me what was missing.</p> <p>21 And I was to cooperate with Marco Diadamo getting them</p> <p>22 finalized.</p> <p>23 Q. Was that after the Las Vegas meeting?</p> <p>24 A. Yes. We actually used some of them. Marco</p> <p>25 got some of the clients that came to our investment --</p>	<p>1 flashy.</p> <p>2 Q. Did that relationship -- he didn't show up to</p> <p>3 Las Vegas. Did that -- did your relationship with him</p> <p>4 change after that? Did he feel like he was getting</p> <p>5 some hate from you, you think, over these issues?</p> <p>6 A. Yes, he did. Because he was supposed to be</p> <p>7 there and he wasn't. I do remember. I did ask him why</p> <p>8 you weren't there. And I said, I went in there and</p> <p>9 there's problems. We could get into a lot of trouble.</p> <p>10 Q. When you asked him why he wasn't there, what</p> <p>11 did he tell you?</p> <p>12 A. He didn't -- he said he -- I don't really</p> <p>13 remember. It was more along the lines, I didn't think</p> <p>14 I needed to be there. I thought we could touch base.</p> <p>15 Q. He didn't express at that point what he's</p> <p>16 expressed subsequently, that he's uncomfortable with</p> <p>17 you?</p> <p>18 A. Gosh, no.</p> <p>19 Q. So would you say that the -- did the</p> <p>20 relationship, working relationship or relationship with</p> <p>21 Marco, change after he failed to show up in Las Vegas</p> <p>22 and then you were asking him to complete these forms?</p> <p>23 A. I don't -- I don't really -- I don't know how</p> <p>24 to answer that. He was -- we were polite. We were</p> <p>25 courteous. I don't necessarily think I was his</p>
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<p>1 they were previous clients, but he got them to correct</p> <p>2 the paperwork there.</p> <p>3 Q. If Marco -- sorry. Hang on.</p> <p>4 Had you expected Marco to be in Las Vegas for</p> <p>5 that, to go through all these issues?</p> <p>6 A. I had no idea there were those issues</p> <p>7 present. We were to go down there to see the office,</p> <p>8 to meet Carl. And when I walked into the office, I was</p> <p>9 appalled.</p> <p>10 Q. Okay. If Marco has expressed -- would it</p> <p>11 surprise you if he's expressed that he's uncomfortable</p> <p>12 around you?</p> <p>13 A. And why is that?</p> <p>14 Q. Would it surprise you?</p> <p>15 A. No.</p> <p>16 Q. Why wouldn't it surprise you? Has he</p> <p>17 expressed that in some way before?</p> <p>18 A. No.</p> <p>19 Q. So why wouldn't it surprise you?</p> <p>20 A. Because I think we're vastly different</p> <p>21 people.</p> <p>22 Q. Can you elaborate on that?</p> <p>23 A. Corey and I have been married for numerous</p> <p>24 years. We have 12 children. We're devout Christians.</p> <p>25 None of those were really Marco's bag. He was very</p>	<p>1 favorite person, but I don't think he cared for me from</p> <p>2 the beginning. Like I said, I think we're just</p> <p>3 different people. He was never argumentative, and I</p> <p>4 was never argumentative to him.</p> <p>5 Q. Did he ever try to instigate a personal</p> <p>6 relationship of any kind?</p> <p>7 A. Oh, gosh, no. No.</p> <p>8 Q. The lack of documents you found, you know,</p> <p>9 completed documents you found in the case of Marco, you</p> <p>10 said, was that true in the case of any other sales of</p> <p>11 coins when you went to the office?</p> <p>12 A. I would have to look. There was -- I don't</p> <p>13 remember. I've never met Brian, the other salesperson.</p> <p>14 Nor had I ever -- he was not particularly active, as</p> <p>15 far as I can remember. Marco Diadamo was the person</p> <p>16 that was taking care of them.</p> <p>17 Q. Even though you hadn't met these people, were</p> <p>18 some of them responsible for these documents that may</p> <p>19 have been incomplete?</p> <p>20 A. I have no idea. I have no idea. Marco</p> <p>21 Diadamo was in charge of the sales. Many of them were</p> <p>22 his clients. Some could have been Brian's, but at that</p> <p>23 time, Marco Diadamo was in charge of the sales. The</p> <p>24 paperwork wasn't there. It was important paperwork.</p> <p>25 Q. Excuse me one second. Were you the one that</p>

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1 had asked Marco to come to Las Vegas for the meeting in  
2 the first place?  
3 A. I had mentioned it to Marcus that I would  
4 like him to come. And then Marcus had said, well, if  
5 you want him there, call him. I had asked Marco to  
6 come. Honestly, I can't really remember if I knew  
7 prior to me leaving he wasn't coming. He was  
8 resistant. I had told him I would like -- Marcus had  
9 said he was to come. I know later on in January, he  
10 told me, well, Marcus said it was up to him, and he  
11 didn't feel he had to go.  
12 Q. Marcus was not originally going to go to the  
13 office; right, on that trip to Las Vegas?  
14 A. I don't know. I don't remember.  
15 Q. Was Corey originally going on that trip?  
16 A. Yes. I believe the two people that were more  
17 going was Corey and Marcus. I was an afterthought.  
18 Q. Going backwards for just a second, make sure  
19 I have this. The issue again of the Aten coin, an  
20 opinion that it could be a security or could be wrong  
21 to sell it, that's the implication, right, that it  
22 could have been a security and, therefore, selling it  
23 in the way it was done was wrong? Is that what your --  
24 A. That was my understanding, yes.  
25 Q. And when you told these people about that

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1 statement by the ASC, you told them specifically that  
2 the -- well, I don't know if you said opinion or not,  
3 but you told them that the ASC had said these coins are  
4 security?  
5 A. I tried very hard to make it clear that that  
6 was an opinion and that's what we were told. Not so  
7 much -- okay. Let me rephrase that. Not that it was  
8 opinion, but it could be considered a security. And in  
9 his opinion, it -- that in his opinion that there was a  
10 great deal of question to it being a security.  
11 Q. When you told other people about that  
12 conversation, you weren't quite as slow and circumspect  
13 in describing the situation; right?  
14 A. Probably not. The conversation had only  
15 happened a month before that. This is five years. I'm  
16 trying to think about what I said rather than  
17 paraphrasing it.  
18 Q. Pardon me a second. Let me try to skip  
19 through some of this stuff.  
20 Do you work with Corey in his construction  
21 business?  
22 A. Not officially. I would help him with safety  
23 documents when he needed it. I would comply and edit  
24 the policies and procedures. I would plan functions  
25 for the staff and customer appreciation when they

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1 needed help.  
2 Q. What's the name of that business?  
3 A. The one when he was there? He was working  
4 with his father and it was A&A Trenching.  
5 Q. So it's no longer in business?  
6 A. His father retired. We work out of -- Corey  
7 has a smaller, same type of business, we just run it  
8 out of our office, out of our home, now.  
9 Q. As far as that one, do you work with him on  
10 that one?  
11 A. I have 12 children and I home school eight of  
12 them.  
13 Q. Okay.  
14 A. That is profoundly a blue job.  
15 Q. Understood. My wife is from 10, but --  
16 A. If you could find the time in my day for me  
17 to help him, he would be eternally grateful.  
18 Q. Did you ever work with someone named Brian  
19 Darrow?  
20 A. Personally, like, work-work?  
21 Q. Do you know who that is?  
22 A. No.  
23 Q. Okay. You don't know who Brian Darrow,  
24 D-A-R-R-O-W is?  
25 A. Like "bureau" with a B and an A? That name

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1 sounds vaguely familiar.  
2 Q. Do you know whether he worked for NAC prior  
3 to your becoming an officer?  
4 A. Oh, is that the salesperson?  
5 MR. KNECHT: Objection to form.  
6 BY MR. OLSEN:  
7 Q. It could be. Is that the Brian you were  
8 thinking of?  
9 A. That's the Brian that I know of. I don't  
10 know what Brian's last name was. I would have to look  
11 back into the --  
12 Q. Have you ever spoken with him?  
13 A. No, not that I can recall.  
14 Q. Do you know why he was -- why he left NAC?  
15 A. I don't really know. I had heard rumors that  
16 there was -- he had some personal issues.  
17 Q. Okay. You don't have any personal knowledge  
18 of what those issues were?  
19 A. I think he was drinking too much. That's  
20 what I had kind of heard.  
21 Q. Nothing directly related to the work he was  
22 doing?  
23 A. I know that when I was present, there was  
24 concern about once we had established he was no longer  
25 with NAC, he had a website or a webmail or something



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<p>1 where he was contacting -- if this is the salesperson, 2 he had -- was contacting coin holders and trying to get 3 them to sell their coins to come on to another -- 4 another venture.</p> <p>5 We had a Skype conversation. Marcus Andrade 6 told me that. And he informed me that if this is this 7 Brian, that Brian had screwed himself. And I asked 8 Marcus why. And Marcus informed me that Brian had been 9 given a bonus of, I believe, 50,000 coins, and when 10 Marcus had found out what Brian had done, Marcus went 11 in and shut down his wallet.</p> <p>12 And I was -- I was angry with Marcus. I told 13 him, you cannot do this. We have just been doing all 14 of this marketing that this is a theft-proof -- this is 15 a theft-proof currency. You can't go in and lock out a 16 person's wallet. You cannot do that. You need to have 17 Aga deal with it.</p> <p>18 I sent the information to Aga. Marcus then 19 told me he was going to return the coins. And then him 20 and Aga dealt with that from that point on.</p> <p>21 Q. You don't know what ultimately happened with 22 those coins?</p> <p>23 A. I do not.</p> <p>24 Q. Okay. And you don't know what the written 25 contract, if any, Brian had with the company was?</p>	<p>1 be stopped, to put it simply? That it could be 2 detected and stopped and there could be some 3 interaction with the law? Isn't that the point of the 4 Aten coin?</p> <p>5 A. Yes, it is, but not -- but through the 6 appropriate law enforcement channels. We had in our -- 7 in the presentation, and anytime I had ever heard it, 8 it was there that when the law enforcement had proof 9 and contacted Aten coin, that Aten coin would do all 10 that was necessary to freeze and prevent money 11 laundering. It was not that we could go in and decide 12 arbitrarily that somebody had done something wrong and 13 to take those coins.</p> <p>14 Q. Well, you'll agree with me, though, if Brian 15 had breached the contract, then that wasn't arbitrary; 16 right?</p> <p>17 MR. KNECHT: Objection.</p> <p>18 THE WITNESS: In my opinion, that was for the 19 legal team to decide. Why is it Marcus' job to decide 20 that he's violated a contract?</p> <p>21 BY MR. OLSEN:</p> <p>22 Q. Well, you don't know what the contract said, 23 plus, you spoke with Aga at some point; correct?</p> <p>24 A. Not until after I informed Aga and encouraged 25 Marcus to talk to Aga. He had done it without</p>
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<p>1 A. He told me that -- Marcus told me that he 2 felt he could take those coins without Brian's 3 knowledge because in the contract he had violated the 4 contract because he was using the client base for 5 soliciting for other. And I told him, I said, I don't 6 care. It's wrong. You have to have legal -- you have 7 to inform him.</p> <p>8 Q. You don't know what his contract said, 9 though; right?</p> <p>10 A. No. Marcus told me.</p> <p>11 Q. But it might have said he could do that?</p> <p>12 A. Perhaps, he could. He never said he could.</p> <p>13 When I told him -- when I informed Marcus, Marcus, you 14 have promised people that this was theft proof. You 15 are destroying the public image to be able to remove 16 coins from somebody's wallet. Marcus said, yeah, I 17 guess. I said, you need to talk to Aga. Aga needs to 18 deal with this. If you're taking those coins, it's got 19 to be through Aga.</p> <p>20 Q. You're not sure how it all worked out; right?</p> <p>21 A. I know that, like I told him, told him to 22 cease and desist. After that, I don't know.</p> <p>23 Q. Isn't one of the -- as I understand these 24 coins, isn't one of the benefits of these coins that if 25 there's criminal activity being detected, that it can</p>	<p>1 discussing it with Aga.</p> <p>2 Q. When you and Corey first met with the NAC 3 team, that was in Warsaw; right?</p> <p>4 A. Yes.</p> <p>5 Q. And Aga was Polish; right?</p> <p>6 A. Yes.</p> <p>7 Q. In Warsaw at the time?</p> <p>8 A. Yes.</p> <p>9 Q. You met her initially?</p> <p>10 A. Yep.</p> <p>11 Q. Did Aga invite you to that or did you just 12 show up?</p> <p>13 A. No. Previous to us buying the last bit of 14 coins or in the process of the various purchasing of 15 coins, Marcus contacted Corey to get -- Corey wanted 16 more information. Marco Diadamo gave Marcus Corey's 17 number. Corey and Marcus discussed this. They 18 developed a relationship. Marcus would call and share 19 updates with Corey. We happened to be in home 20 schooling when Marcus called about the conference. He 21 was very excited about --</p> <p>22 (Whereupon, audio transmission was lost and 23 the call was reestablished.)</p> <p>24 THE WITNESS: He told Corey the political 25 figures and some of the well-known figures that were</p>



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<p>1 invited to this. He explained it, it was not so much 2 for purchasers, but it was to explore the need, to 3 paraphrase it, to explore the need for oversight on 4 digital currency and the problems digital currencies 5 can give to law enforcement and to government and the 6 way the governments could benefit from digital currency 7 and unbanked.</p> <p>8 During that conversation, Marcus asked Corey, 9 that he really wanted Corey to come on board and be 10 involved because he deeply respected Corey and that 11 Marcus was -- was flailing a little bit in the business 12 aspect. That he was first and foremost a deeply 13 Christian man who was -- just wanted to do the research 14 and the coding. And Corey was, like, Marcus, I know 15 little to nothing about that. Come on board at least 16 as an advisor on the board or something.</p> <p>17 And it was at that point that the offer -- 18 Corey told him how excited he was to share Poland and 19 that would be an exciting venture to take part in and 20 look at. Marcus encouraged. He said, come down. I'd 21 love for you to come. We're not bringing any other 22 coin holders. It's mainly for the banking and the 23 government.</p> <p>24 And then Corey said, well, I would love to. 25 And we talked about it. And he said, you know, Marcus,</p>	<p>1 believe that he had any other sales after we came on 2 board, but Marco was the salesperson. He was the head 3 of the sales team. It was only for this conference 4 that we were to be selling any coins.</p> <p>5 Q. The Alberta conference? 6 A. Yes. 7 Q. Did you or Corey tell Scott Rodgers to speak 8 to the ASC? 9 A. I don't know. I was not present when Corey 10 talked to Scott afterwards. I don't even know if he 11 talked to Scott afterwards. If I may explain 12 something. The month of March, April, and May, we were 13 pregnant with a set of twins. We lost one and then we 14 lost the second. And I was in and out of the hospital 15 for at least a period of a couple of months.</p> <p>16 Q. That's in 2016? 17 A. Yes. 18 Q. Did you take a Barbados trip? 19 A. Yes, in February. 20 Q. Okay. And that was on behalf of or in 21 connection with NAC? 22 A. Yes, it was. We had sponsored the 23 cryptocurrency event there. 24 Q. Okay. 25 A. Part of Agnieszka Bilinska's marketing plan</p>
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<p>1 I'd like to take you up on that offer. And Marcus 2 asked us to please email him a request for the 3 invitation with all of our, like, our names, our 4 address, and what not so Aga could, for security and 5 then to issue the invitations, which we then got both 6 Agnieszka Bilinska and Aga emailed us welcoming us to 7 Warsaw.</p> <p>8 BY MR. OLSEN: 9 Q. Do you know someone named Scott Rodgers? 10 A. Yes. 11 Q. Who's Scott Rodgers? 12 A. Scott Rodgers is a friend of ours that we know 13 through church. And he, at the time, was attending the 14 same church as us. We've been friends. Our kids have 15 been, you know, acquaintances and friends throughout 16 the years.</p> <p>17 Q. And did he buy Aten coins? 18 A. Yes, he did. 19 Q. Corey was his representative? 20 A. Yes, it was. 21 Q. Just for the record, when I say 22 representative, is that a term that was used? What was 23 the term used for people that made a sale? 24 A. Well, typically, Brian and Marc were the 25 salespeople. Prior to us, Brian was the only. I don't</p>	<p>1 was to get Aten coins present at some of the money 2 conferences and the independent cryptocurrency 3 conferences. And that was one that we had agreed to in 4 December that we would sponsor and then attend. Marcus 5 had first just encouraged me to attend and I did not 6 feel that I could do that job. So Agnieszka came as 7 somebody to build relationships and meet people.</p> <p>8 Q. By the Barbados trip, hadn't you and Corey 9 pretty much decided that you were going to part ways 10 with NAC? 11 A. No. We were struggling. To be honest, I 12 still believed that -- I still believed in the product 13 and I still believed that Marcus was just mismanaging. 14 We had truly hoped that our fears and some of the 15 things that we could see were just mistakes. Because 16 Marcus was a coder who had stumbled upon this idea and 17 wasn't -- he had always said he wasn't really a 18 businessman, like, that he was a middle class worker 19 who struck on this big idea and started it to defend 20 the little person, and that he needed somebody to keep 21 him held accountable and do the housework. So even in 22 February, that was -- that was our hope.</p> <p>23 Q. Isn't that true about Marcus, that he's a 24 coder, he's a working class guy who's come upon an 25 idea, and if there's any flaws in this, it's in the</p>

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<p>1 execution of a lack of business experience?</p> <p>2 A. I do not agree with that right now.</p> <p>3 Q. What makes you say that?</p> <p>4 A. He simply lied too many times for that to be</p> <p>5 true.</p> <p>6 Q. Give me one. Tell me one.</p> <p>7 A. The numerous times that he promised us while</p> <p>8 we were trying to negotiate that he would give us our</p> <p>9 money back and didn't. The times he said that the</p> <p>10 reasons why he couldn't agree on the term papers was</p> <p>11 because he was waiting.</p> <p>12 Terence and Aga and the rest of the team were</p> <p>13 unhappy. Afterwards, I contacted Aga. Aga had never</p> <p>14 -- Aga and Igor were part of the team. They had never</p> <p>15 seen our term paper. They had only heard parts of it.</p> <p>16 The last time we talked to him in April, May,</p> <p>17 whatever it was, he agreed to give us back our money,</p> <p>18 and he just said, please, we're going to London. I</p> <p>19 cannot have this IPO on here. I'm sorry that it was --</p> <p>20 I can't have this litigation. If you were to sue me, I</p> <p>21 can't have this. I'm sorry it didn't work. I can't</p> <p>22 pay you out right away. Give me a month to put it</p> <p>23 together. I promise you I'll get it done.</p> <p>24 And day 28 I was served with a lawsuit after</p> <p>25 Corey was served with a lawsuit after he promised that</p>	<p>1 He registered in London while we were -- and</p> <p>2 had no intention. The changes in the term paper, and I</p> <p>3 have Skype conversations saying it, we told him -- we</p> <p>4 just wanted some assurance. We told him very clearly,</p> <p>5 this change in term was a wake-up call. Marcus, prove</p> <p>6 to us that you are honest. Prove to us that we're</p> <p>7 valued, and give us some type of security, and we were</p> <p>8 happy to continue.</p> <p>9 MR. OLSEN: Let's take a break. We can</p> <p>10 probably wrap this up soon. Let's take a quick break.</p> <p>11 I'm sure you've got other things to do. Let's just</p> <p>12 take a break and see if we can get this -- let's take</p> <p>13 five minutes.</p> <p>14 (Whereupon, a recess was taken.)</p> <p>15 BY MR. OLSEN:</p> <p>16 Q. Ms. Jodoin, you were talking about your</p> <p>17 reasons -- the times when Marcus hadn't been, in your</p> <p>18 view, truthful with you. We were talking about, really</p> <p>19 talking about, the time after things had fallen apart</p> <p>20 and you were negotiating a resolution. You said --</p> <p>21 your testimony was that you were -- and you were the</p> <p>22 one, just so we're clear on the record, you were the</p> <p>23 one having these discussions by email personally with</p> <p>24 Marcus about trying to get your money back or trying to</p> <p>25 resolve this dispute; right?</p>
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<p>1 he was going to do this and he had no interest in</p> <p>2 litigation or holding anything against us.</p> <p>3 Q. But you were -- you were in discussions,</p> <p>4 negotiations, though; right? He wasn't saying, I'll</p> <p>5 cut you a check?</p> <p>6 A. No. He said he was going to cut us a check.</p> <p>7 He just needed time to get it done. Please don't move</p> <p>8 forward. Please do not -- please do not -- he told me</p> <p>9 to ignore the cease and desist order, that that was</p> <p>10 something his lawyer put in, that he didn't want it.</p> <p>11 Q. Isn't it true in the first litigation,</p> <p>12 particularly, in this litigation, too, but primarily</p> <p>13 there, it was adamant there was dispute as to the terms</p> <p>14 of the agreement or did you not read it?</p> <p>15 A. Yes and no. I have Skype conversations</p> <p>16 leading up to it. All we were asking for was him to</p> <p>17 turn over the financials. Let us see your financials.</p> <p>18 When we were not picking a person to go IPO, when that</p> <p>19 was not being seen, we had no security. We asked him</p> <p>20 to put our names on NAC. We said, it doesn't even have</p> <p>21 to be voting shares. We just want to own something.</p> <p>22 He said yes, not once, but twice, and then backed down.</p> <p>23 He said, we can't do it on NAC because that would get</p> <p>24 us in trouble with the SEC. But in London, when I</p> <p>25 register, we'll go there and you'll be registered.</p>	<p>1 A. Yes, some of them with me, some of them with</p> <p>2 Corey.</p> <p>3 Q. Okay. And you said --</p> <p>4 A. Some of them together on the phone.</p> <p>5 Q. Okay. And you said -- your testimony was</p> <p>6 that you had been having these discussions and Marcus</p> <p>7 said he was going to do this, that, and the other</p> <p>8 thing, and that you were surprised to then have him</p> <p>9 turn around and sue you?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. But if you look at the exhibit,</p> <p>12 Exhibit 1, if you look at page BJodoin0048.</p> <p>13 A. 48, okay.</p> <p>14 MR. KNECHT: Bottom, right-hand corner.</p> <p>15 MR. OLSEN: She's been doing a pretty good</p> <p>16 job of finding it.</p> <p>17 THE WITNESS: Okay. Yep.</p> <p>18 BY MR. OLSEN:</p> <p>19 Q. This is a letter from Brandon Tesser at an LA</p> <p>20 firm called Tesser Ruttenberg &amp; Grossman. This is</p> <p>21 dated March 31st, 2016. This is the demand letter sent</p> <p>22 on your behalf before the litigation started.</p> <p>23 A. Yes.</p> <p>24 Q. Okay. So you sent a demand letter to</p> <p>25 Mr. Andrade on March 31st. And if you look at page</p>

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<p>1 0051.</p> <p>2 A. Yep.</p> <p>3 Q. It's not just a demand for return of the</p> <p>4 \$275,000 investment; right?</p> <p>5 A. Correct.</p> <p>6 Q. It's also a demand for reimbursement of</p> <p>7 out-of-pocket costs in the amount of \$37,209.19. Do</p> <p>8 you see that?</p> <p>9 A. Um-hum.</p> <p>10 Q. Yes? That's a yes?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And also a demand for compensation for</p> <p>13 Corey's four months of work in the amount of \$41,664,</p> <p>14 and your compensation for four months of work in the</p> <p>15 amount of \$25,000. You see this?</p> <p>16 A. Yes.</p> <p>17 Q. So these -- as far as the compensation, the</p> <p>18 agreement was that there wasn't going to be any</p> <p>19 compensation for your time until the IPO; right?</p> <p>20 A. That is correct.</p> <p>21 Q. Okay. So does it come as any surprise to you</p> <p>22 that your former lawyers, admittedly, your former</p> <p>23 lawyers in California sent a demand that included a</p> <p>24 demand for compensation prior to the time an IPO had</p> <p>25 occurred? Does it surprise you that the answer was to</p>	<p>1 A. Yes, it can. Yes, it can. Because when I</p> <p>2 told him prior to that I was going to send a letter, I</p> <p>3 told him I was going to send a letter. When a person</p> <p>4 has a conversation with you and they ask you to please</p> <p>5 not take any further legal action, do not do anything,</p> <p>6 I'm getting ready to take this to an IPO in London,</p> <p>7 we're getting ready, I beg you, please, it was simply a</p> <p>8 misunderstanding, I promise you I'll get you your</p> <p>9 money, just give me 30 days. And I say, Marcus, I will</p> <p>10 not do anything else, I believe you, fair enough. And</p> <p>11 then you sue me? That does surprise me because you</p> <p>12 lied.</p> <p>13 Q. Well, you don't know if he lied or he didn't</p> <p>14 or if he got advice to file something --</p> <p>15 A. Then he would have made a phone call.</p> <p>16 Q. That's your big -- that's your biggest --</p> <p>17 A. Then he would have made a phone call.</p> <p>18 Q. That's your biggest example of Marcus being</p> <p>19 not straight with you?</p> <p>20 A. There were others.</p> <p>21 MR. KNECHT: Objection to form.</p> <p>22 Argumentative.</p> <p>23 THE WITNESS: I'm sorry, Adam?</p> <p>24 MR. KNECHT: Objection to form.</p> <p>25 Argumentative.</p>
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<p>1 then get sued?</p> <p>2 A. Well, he, Brandon, advised us that this is</p> <p>3 what we were to do, and that we took it on his. Marcus</p> <p>4 contacted us. We had been talking to Marcus prior to</p> <p>5 and then he refused. We were not -- he contacted us</p> <p>6 after he got this letter, and we had a very good</p> <p>7 discussion. And he asked us, do you really want to get</p> <p>8 paid for this. We said, Marcus, we would just like our</p> <p>9 money back, and the expenses.</p> <p>10 Q. Certainly, that's not what -- on what basis</p> <p>11 were you entitled to the expenses? I'm trying to</p> <p>12 understand that.</p> <p>13 A. Those were the expenses that he had promised</p> <p>14 to pay for. That was our flights and all of the</p> <p>15 expenses of traveling on his behalf. That was the</p> <p>16 conference, the conference costs and the Barbados</p> <p>17 conference, which were -- he was to pay those prior to.</p> <p>18 The only thing we were asking for that wasn't was the</p> <p>19 salaries.</p> <p>20 Q. And -- so, again, you were asking for things</p> <p>21 beyond what was anything to do with the reimbursement</p> <p>22 of the \$275,000. So it couldn't have been -- even if</p> <p>23 you had a conversation with Marcus after the letter, it</p> <p>24 couldn't have been too much of a surprise that he also</p> <p>25 retained a lawyer?</p>	<p>1 MR. OLSEN: You already answered that.</p> <p>2 BY MR. OLSEN:</p> <p>3 Q. You know, isn't it true, too, before the --</p> <p>4 before this demand letter, you had demanded -- you and</p> <p>5 your husband had demanded not just your payment of the</p> <p>6 investment, you also had demanded this compensation</p> <p>7 that you agreed wouldn't have been due until an IPO,</p> <p>8 but you also wanted a bigger percentage of shares at</p> <p>9 that point, didn't you?</p> <p>10 A. Yes, I did. If you look at it at the bottom,</p> <p>11 it said the shares were simply a way to express -- the</p> <p>12 asking of that amount of shares was simply a way to</p> <p>13 express the need to have some type of security.</p> <p>14 Q. And what --</p> <p>15 A. I have emails explaining that to Aga. I have</p> <p>16 emails explaining that to Marcus.</p> <p>17 Q. But that's a change in the deal. You may not</p> <p>18 have had it before, but that wasn't part of the deal to</p> <p>19 have that security; right?</p> <p>20 A. Correct. And it was also part of the deal</p> <p>21 that he was not fulfilling was to give us the shares,</p> <p>22 to surrender the financials, to act in good faith,</p> <p>23 which he was not.</p> <p>24 Q. Where is the obligation to give you the</p> <p>25 financials? Is that in an agreement?</p>

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<p>1 A. It was a verbal agreement.</p> <p>2 Q. When was that made?</p> <p>3 A. Back in Poland and then in LA.</p> <p>4 Q. Let me just clear something up just to make</p> <p>5 sure we get this right. The way this -- there was</p> <p>6 never -- the original deal, the \$275,000, was to get a</p> <p>7 membership percentage, I don't remember the percentage,</p> <p>8 in NAC Foundation; right?</p> <p>9 A. No. Into the company that was going to be</p> <p>10 incorporated to go public.</p> <p>11 Q. Wasn't the structure -- and maybe you don't</p> <p>12 know -- wasn't the structure of this was that company</p> <p>13 that was going to go public in an offering was then</p> <p>14 going to -- there was going to be, I'll call it, I</p> <p>15 don't know, I don't have the language in front of me,</p> <p>16 but essentially a buyout of NAC, in which case the NAC</p> <p>17 shareholders were then going to receive, via purchase</p> <p>18 of their membership interest, going to receive an</p> <p>19 interest in the new company, whatever it was going to</p> <p>20 be called?</p> <p>21 A. I don't -- I don't understand. What I</p> <p>22 understand is that NAC was to be turned into a</p> <p>23 corporation almost immediately. And that when that was</p> <p>24 done, shares were to be given to us, Terence, and the</p> <p>25 other members of the team. That's what I understand.</p>	<p>1 save our relationship and to do a wake-up call. We</p> <p>2 were simply trying to get him to listen to how</p> <p>3 absolutely frustrated we were with the runaround. It</p> <p>4 never was about getting more.</p> <p>5 Q. Well, at some point it was about getting</p> <p>6 more, at least in terms and then it got to the letter?</p> <p>7 A. No, it wasn't. Because those numbers were</p> <p>8 advised to us by Brandon. We told him we simply wanted</p> <p>9 our investment and the \$37,000. He said, you ask for</p> <p>10 more so there's room for negotiating.</p> <p>11 MR. OLSEN: I'm going to let you jump in on</p> <p>12 this.</p> <p>13 THE WITNESS: I'm sorry?</p> <p>14 MR. OLSEN: So advice of counsel, is that --</p> <p>15 MR. KNECHT: It's previous counsel, yeah.</p> <p>16 THE WITNESS: Sorry?</p> <p>17 MR. OLSEN: We'll let that stand.</p> <p>18 BY MR. OLSEN:</p> <p>19 Q. One more question as it relates to this. And</p> <p>20 that is, if there was -- you seem to be concerned about</p> <p>21 the fact there hadn't been an IPO. Initially, there</p> <p>22 wasn't one in Australia, but then there was one in the</p> <p>23 UK, but it was delayed. Didn't you know -- let's say</p> <p>24 you believed that you were going to get shares in that</p> <p>25 company as opposed to your interest, membership</p>
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<p>1 Q. Okay. So you don't -- wasn't the purpose of</p> <p>2 waiting until the IPO to get your compensation is that</p> <p>3 once you get an IPO, then the way you're going to get</p> <p>4 an interest in that is to, I'll call it, transform,</p> <p>5 it's not a legal term, but transform your interest in</p> <p>6 NAC into an interest in this new company?</p> <p>7 A. No. Because he told us because of the</p> <p>8 corporate structure of NAC currently, that he couldn't</p> <p>9 give us the shares. So that we had to wait until that.</p> <p>10 I don't remember why. Corey could probably explain it</p> <p>11 better. But he said he couldn't. He said it would be</p> <p>12 difficult and he couldn't. And then --</p> <p>13 Q. Okay.</p> <p>14 A. He asked us to wait until the actual -- and</p> <p>15 when we first made that agreement, we were in Poland.</p> <p>16 We had just been dazzled by this wonderful presentation</p> <p>17 by James Mawhinney. It was an easy thing to consider.</p> <p>18 And then when James Mawhinney stopped, we still</p> <p>19 believed that it was his fault, not Marcus'.</p> <p>20 Q. So when you were asking -- in the point of</p> <p>21 negotiations when you say you were asking for shares in</p> <p>22 the new company, were you asking for additional shares</p> <p>23 then in the new company as opposed to an additional</p> <p>24 piece of -- a larger piece of NAC?</p> <p>25 A. To be honest, we simply were just trying to</p>	<p>1 interest, in NAC being purchased by new-co. You knew</p> <p>2 you couldn't get that interest then until that IPO</p> <p>3 occurred; right?</p> <p>4 A. Which shares? Can you --</p> <p>5 Q. Okay. Your position was that you were</p> <p>6 entitled to shares in something that hadn't occurred</p> <p>7 yet, and this is what became the IPO in UK?</p> <p>8 A. No. What was supposed to be the IPO in</p> <p>9 Australia.</p> <p>10 Q. You'd agree that IPO in Australia didn't go</p> <p>11 forward?</p> <p>12 A. That's correct.</p> <p>13 Q. Okay. That wasn't a question of fault.</p> <p>14 There were some reasons that went into that not</p> <p>15 happening. They were business reasons; right?</p> <p>16 A. Exactly. It was what we felt to be James</p> <p>17 Mawhinney's, the fee structure was not well -- it was</p> <p>18 not prudent for the cost.</p> <p>19 Q. And then so somebody else came in to -- had a</p> <p>20 different fee structure, and it had to be done -- it</p> <p>21 was decided to be done in the UK?</p> <p>22 A. No. We never -- we had talked about many</p> <p>23 places and finally London was decided upon. But we</p> <p>24 had -- at this point, there was still nothing going</p> <p>25 forward. We had no one, as far as we knew, that was</p>

Page 137		Page 139	
1	promising to do that for us. That contract, that step	1	THE STENOGRAPHER: Mr. Knecht, do you want a
2	to engage somebody, was not happening.	2	copy of this?
3	Q. Okay. But there was a decision made	3	MR. KNECHT: Yes, just a digital copy.
4	internally at least to go to the UK to do the IPO for	4	MR. OLSEN: Thanks, everyone. Enjoy the
5	business reasons, we agreed. And then the -- it hadn't	5	weekend. Stay safe.
6	happened yet. But you knew -- well, in your version of	6	MR. KNECHT: Thank you.
7	the story, your interest was going to be in that new	7	(Whereupon, the deposition was concluded at
8	company. So it wasn't like you were entitled to,	8	5:22 p.m.)
9	according to your version of the story, any shares yet;	9	* * * * *
10	right?	10	
11	A. Well, I don't -- I don't agree with that.	11	
12	What I know is that it was not happening. And we	12	
13	started to have grave concerns that it was ever going	13	
14	to happen. And we still could not get anything other	14	
15	than that handwritten note written. So we simply asked	15	
16	for some security, could you then put not just our	16	
17	name, but Aga and Terence's on NAC currently, and then	17	
18	we could all have our security there. We could have	18	
19	proper buyout, sell out, we could have it all	19	
20	structured there and we don't have to wait.	20	
21	Q. Who all owned interest in NAC?	21	
22	A. The only person who owned it was Marcus.	22	
23	Q. Okay. And who was going to own most of the	23	
24	interest, at least other than went to the public, in	24	
25	new-co?	25	
Page 138		Page 140	
1	A. New company? Marcus was. Well, he would	1	CERTIFICATE OF DEPONENT
2	have the majority.	2	PAGE LINE CHANGE REASON
3	Q. An IPO happening would have benefited Marcus	3	
4	more than anyone; correct?	4	
5	A. Yes.	5	
6	Q. When the money was paid -- this is really my	6	
7	last question. When the 275 was paid by you and your	7	
8	husband, was there a reason it needed to be paid by a	8	
9	certain date?	9	
10	A. Yes. Because he was having cash flow issues.	10	
11	Q. Okay. Was there a reason that that worked	11	
12	out for the two of you as well?	12	
13	A. Not really.	13	* * * * *
14	MR. OLSEN: Okay. I have nothing further.	14	I, BRANDI JODOIN, deponent herein, do hereby
15	MR. KNECHT: I don't have anything, counsel.	15	certify and declare the within and foregoing
16	MR. OLSEN: Good job, counsel.	16	transcription to be my deposition in said action; that
17	MR. KNECHT: Yep.	17	I have read, corrected, and do hereby affix my
18	MR. OLSEN: Thank you. I know it's late up	18	signature to said deposition under penalty of perjury.
19	there. And I appreciate your hanging on so we can --	19	
20	and going through the video process. And to the court	20	BRANDI JODOIN, Deponent
21	reporter, her phone is still bouncing around. Not sure	21	
22	if she's hearing us, but thank you.	22	
23	THE STENOGRAPHER: I'm here.	23	
24	MR. KNECHT: I appreciate it. Thanks Brandi,	24	
25	Eric, Kim. Appreciate it.	25	Job No. 40110



1 CERTIFICATE OF REPORTER

2 STATE OF NEVADA )

3 ) ss:  
COUNTY OF CLARK )

4 I, Kimberly A. Farkas, a Certified Court Reporter

5 licensed by the State of Nevada, do hereby certify:

6 That I reported the deposition of BRANDI JODOIN, April  
7 3, 2020, at 1:05 p.m.

8 That prior to being deposed, the witness was  
9 duly sworn by me to testify to the truth. That I  
10 thereafter transcribed my said stenographic notes into  
11 written form, and that the typewritten transcript is a  
12 complete, true, and accurate transcription of my said  
13 stenographic notes; that review of the transcript was  
14 requested.

15 I further certify that I am not a relative,  
16 employee or independent contractor of counsel or of any  
17 of the parties involved in the proceeding; nor a person  
18 financially interested in the proceeding.

19 IN WITNESS WHEREOF, I have set my hand in my  
20 office in the County of Clark, State of Nevada, this  
21 21st day of April, 2020.

22

23 \_\_\_\_\_  
Kimberly A. Farkas, CCR NO. 741

24

25

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\$275,000 (10)	384-7000 (1)	acting (1)	allegation (2)
\$37,000 (1)	< 4 >	action (3)	allegations (8)
\$37,209.19 (1)	4 (1)	actions (2)	allow (2)
\$40 (15)	40 (2)	active (2)	allowed (2)
\$41,664 (1)	40110 (2)	activities (1)	Alverson (1)
\$5 (1)	41 (1)	activity (1)	American (5)
	48 (1)	actual (6)	Amigo (1)
		ADAM (4)	AML (2)
< 0 >	< 5 >	adamant (1)	AML-compliant (1)
0051 (1)	5 (1)	addition (1)	amount (11)
0095 (1)	5:22 (1)	additional (4)	analogy (1)
	50,000 (1)	address (3)	Andrade (16)
< 1 >		adequate (1)	Andrea (11)
1 (10)	< 6 >	administering (1)	Angela (1)
1:05 (5)	6605 (1)	administration (1)	Angie (3)
10 (3)		administrative (2)	angry (5)
100 (1)	< 7 >	admission (4)	answer (34)
12 (6)	702 (1)	admissions (6)	answered (2)
140 (4)	725 (1)	Admit (8)	answers (12)
14th (2)	7251 (1)	admittedly (1)	anybody (2)
15 (2)	741 (4)	ads (1)	anytime (1)
16 (3)	75 (1)	advanced (1)	apart (1)
16th (1)	777-3000 (1)	advice (3)	Apologize (6)
18 (1)		advised (4)	appalled (1)
1st (1)	< 8 >	advisor (1)	apparent (1)
	89119 (1)	affidavit (4)	APPEARANCES (1)
< 2 >	89149 (1)	affiliation (1)	
200 (1)		affix (1)	applicable (1)
2015 (4)	< A >	afraid (1)	appoint (1)
2016 (13)	A-18-770594-C (2)	Africa (2)	appointed (1)
2018 (17)	ABA (3)	African (4)	appreciate (3)
2019 (8)	Abbott (3)	afternoon (1)	appreciation (1)
2020 (7)	ability (3)	afterthought (1)	approached (2)
210 (1)	able (4)	Aga (35)	appropriate (2)
21st (2)	Abramoff (3)	agencies (1)	approval (5)
22nd (3)	absolutely (4)	agency (2)	approvals (2)
25 (1)	access (1)	Agent (3)	approved (1)
25th (1)	accomplish (1)	agents (6)	approximately (2)
27 (4)	account (2)	Agnieszka (9)	April (14)
275 (1)	accountable (1)	ago (1)	arbitrarily (1)
27th (1)	accountant (1)	agree (7)	arbitrary (1)
28 (1)	accumulated (2)	agreed (7)	argument (1)
2nd (1)	accurate (4)	agreeing (1)	Argumentative (5)
	accurately (1)	agreement (19)	arrange (1)



<b>ASC</b> (47) <b>ASC's</b> (2) <b>aside</b> (3) <b>asked</b> (47) <b>asking</b> (21) <b>asks</b> (2) <b>aspect</b> (1) <b>asset</b> (3) <b>assets</b> (1) <b>associated</b> (1) <b>association</b> (3) <b>assume</b> (6) <b>assumed</b> (4) <b>assumption</b> (2) <b>assurance</b> (5) <b>Aten</b> (24) <b>attach</b> (2) <b>attain</b> (1) <b>attainable</b> (2) <b>attend</b> (2) <b>attending</b> (1) <b>attention</b> (1) <b>attorney</b> (7) <b>audio</b> (2) <b>August</b> (10) <b>Australia</b> (5) <b>Australian</b> (2) <b>authorities</b> (6) <b>avoid</b> (1) <b>avoids</b> (1) <b>aware</b> (7)  <b>&lt; B &gt;</b> <b>back</b> (28) <b>backed</b> (1) <b>backwards</b> (1) <b>Bad</b> (2) <b>bag</b> (1) <b>baker</b> (1) <b>Bankers</b> (1) <b>banking</b> (2) <b>banks</b> (1) <b>banner</b> (1) <b>Barb</b> (2) <b>Barbados</b> (3) <b>base</b> (4) <b>based</b> (7) <b>basic</b> (3) <b>basically</b> (1) <b>basing</b> (1)	<b>basis</b> (10) <b>battery</b> (1) <b>Bear</b> (2) <b>becoming</b> (1) <b>beg</b> (1) <b>beginning</b> (2) <b>behalf</b> (7) <b>believe</b> (49) <b>believed</b> (7) <b>believing</b> (1) <b>benefit</b> (2) <b>benefited</b> (1) <b>benefits</b> (1) <b>Bert</b> (3) <b>best</b> (10) <b>better</b> (3) <b>beyond</b> (3) <b>big</b> (2) <b>bigger</b> (1) <b>biggest</b> (2) <b>Bilinska</b> (4) <b>Bilinska's</b> (1) <b>bills</b> (1) <b>binding</b> (1) <b>biographies</b> (1) <b>biography</b> (1) <b>bios</b> (2) <b>birthday</b> (1) <b>bit</b> (4) <b>Bitcoin</b> (5) <b>BJodoin0001</b> (1) <b>BJodoin0048</b> (1) <b>BJodoin0082</b> (1) <b>BJodoin0083</b> (1) <b>BJodoin0086</b> (1) <b>BJodoin0087</b> (1) <b>BJodoin0091</b> (1) <b>BJodoin0093</b> (1) <b>BJodoin0094</b> (1) <b>black</b> (2) <b>blow</b> (1) <b>blowing</b> (1) <b>blue</b> (1) <b>blue-collar</b> (1) <b>board</b> (9) <b>boils</b> (1) <b>Bokenfohr</b> (1) <b>Bokenfohrs</b> (2) <b>bond</b> (1) <b>bonus</b> (1)	<b>booklet</b> (1) <b>born</b> (3) <b>Bottom</b> (2) <b>bought</b> (2) <b>bouncing</b> (1) <b>BRANDI</b> (17) <b>B-R-A-N-D-I</b> (1) <b>Brandon</b> (3) <b>breached</b> (1) <b>break</b> (6) <b>Brian</b> (13) <b>Brian's</b> (3) <b>bring</b> (4) <b>bringing</b> (1) <b>brought</b> (5) <b>build</b> (2) <b>bunch</b> (1) <b>bureau</b> (1) <b>business</b> (36) <b>businessman</b> (1) <b>butchered</b> (1) <b>buy</b> (8) <b>buyer</b> (2) <b>buying</b> (3) <b>buyout</b> (3)  <b>&lt; C &gt;</b> <b>CAL</b> (1) <b>C-A-L</b> (1) <b>C-A-L-E</b> (1) <b>California</b> (1) <b>call</b> (37) <b>called</b> (15) <b>calls</b> (9) <b>Canada</b> (7) <b>Canadian</b> (3) <b>canceling</b> (1) <b>cancer</b> (3) <b>capacity</b> (1) <b>cards</b> (1) <b>care</b> (2) <b>cared</b> (1) <b>careful</b> (1) <b>Carl</b> (10) <b>Case</b> (15) <b>cases</b> (2) <b>cash</b> (2) <b>categories</b> (1) <b>caterer</b> (1) <b>Catherine</b> (2)	<b>CC'd</b> (1) <b>CCR</b> (3) <b>cease</b> (2) <b>cell</b> (11) <b>Cenzartowicz</b> (1) <b>certain</b> (11) <b>certainly</b> (5) <b>CERTIFICATE</b> (2) <b>Certified</b> (3) <b>certify</b> (3) <b>cetera</b> (1) <b>change</b> (6) <b>changed</b> (1) <b>changes</b> (4) <b>channels</b> (1) <b>Chantal</b> (3) <b>characterization</b> (1) <b>charge</b> (10) <b>charger</b> (1) <b>charging</b> (1) <b>cheated</b> (1) <b>check</b> (2) <b>cheerleader</b> (1) <b>cheese</b> (3) <b>Chicago</b> (2) <b>chief</b> (5) <b>children</b> (4) <b>choice</b> (1) <b>choices</b> (1) <b>chose</b> (1) <b>Christian</b> (1) <b>Christians</b> (1) <b>church</b> (3) <b>circumspect</b> (1) <b>cite</b> (1) <b>citizen</b> (2) <b>City</b> (1) <b>claim</b> (3) <b>claimed</b> (1) <b>clarification</b> (1) <b>clarify</b> (4) <b>CLARK</b> (4) <b>class</b> (2) <b>cleaned</b> (1) <b>clear</b> (17) <b>clearly</b> (1) <b>client</b> (4) <b>clients</b> (7)
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<b>close</b> (1)	<b>confusion</b> (2)	<b>COURT</b> (13)	<b>definitely</b> (4)
<b>coder</b> (2)	<b>Congress</b> (1)	<b>courteous</b> (1)	<b>degree</b> (1)
<b>coding</b> (2)	<b>conjecture</b> (1)	<b>Court's</b> (3)	<b>delayed</b> (1)
<b>coin</b> (63)	<b>connection</b> (4)	<b>crime</b> (1)	<b>delete</b> (5)
<b>coins</b> (74)	<b>conscience</b> (1)	<b>criminal</b> (1)	<b>deleted</b> (1)
<b>cold</b> (1)	<b>consider</b> (3)	<b>criminally</b> (3)	<b>deleting</b> (1)
<b>collateral</b> (1)	<b>considered</b> (9)	<b>criteria</b> (1)	<b>demand</b> (9)
<b>collecting</b> (1)	<b>constantly</b> (2)	<b>criticized</b> (1)	<b>demanded</b> (3)
<b>college</b> (1)	<b>construction</b> (4)	<b>critique</b> (1)	<b>denial</b> (1)
<b>color</b> (1)	<b>consultation</b> (1)	<b>critiqued</b> (1)	<b>deny</b> (2)
<b>colors</b> (2)	<b>contact</b> (13)	<b>crook</b> (2)	<b>depo</b> (1)
<b>come</b> (16)	<b>contacted</b> (29)	<b>crypto</b> (1)	<b>DEPONENT</b> (3)
<b>comes</b> (1)	<b>contacting</b> (4)	<b>cryptocurrencies</b>	<b>deposed</b> (2)
<b>coming</b> (1)	<b>contacts</b> (1)	(1)	<b>DEPOSITION</b> (17)
<b>commenced</b> (2)	<b>content</b> (9)	<b>cryptocurrency</b> (8)	<b>Dept</b> (1)
<b>commencement</b> (1)	<b>contest</b> (2)	<b>CSR</b> (1)	<b>describe</b> (2)
<b>comment</b> (3)	<b>context</b> (1)	<b>currencies</b> (1)	<b>described</b> (3)
<b>comments</b> (2)	<b>continue</b> (3)	<b>currency</b> (4)	<b>describing</b> (1)
<b>Commission</b> (6)	<b>contract</b> (18)	<b>currently</b> (2)	<b>Description</b> (1)
<b>common</b> (1)	<b>contractor</b> (1)	<b>customer</b> (2)	<b>design</b> (3)
<b>communicate</b> (2)	<b>contracts</b> (1)	<b>customers</b> (2)	<b>designate</b> (1)
<b>communicated</b> (5)	<b>conversation</b> (34)	<b>cut</b> (2)	<b>designer</b> (1)
<b>communication</b> (8)	<b>conversations</b> (7)	<b>Cynthia</b> (1)	<b>designs</b> (2)
<b>communications</b>	<b>convinced</b> (2)		<b>desist</b> (3)
(8)	<b>COO</b> (6)	<b>&lt; D &gt;</b>	<b>despite</b> (1)
<b>community</b> (1)	<b>cooperate</b> (1)	<b>dad</b> (1)	<b>destroying</b> (1)
<b>company</b> (67)	<b>copies</b> (3)	<b>Dakota</b> (1)	<b>detail</b> (3)
<b>compensation</b> (7)	<b>copy</b> (3)	<b>Darren</b> (12)	<b>detailed</b> (1)
<b>complainant</b> (1)	<b>core</b> (1)	<b>Darrow</b> (2)	<b>detailing</b> (1)
<b>complaint</b> (2)	<b>COREY</b> (67)	<b>D-A-R-R-O-W</b> (1)	<b>details</b> (1)
<b>complaints</b> (4)	<b>Corey's</b> (5)	<b>date</b> (8)	<b>detected</b> (2)
<b>complete</b> (2)	<b>corner</b> (2)	<b>dated</b> (1)	<b>determine</b> (1)
<b>completed</b> (6)	<b>corporate</b> (10)	<b>dates</b> (1)	<b>devastating</b> (1)
<b>completely</b> (2)	<b>corporation</b> (1)	<b>day</b> (3)	<b>develop</b> (2)
<b>compliance</b> (3)	<b>CORPORATIONS</b>	<b>days</b> (1)	<b>developed</b> (1)
<b>compliant</b> (2)	(1)	<b>dazzled</b> (1)	<b>devout</b> (1)
<b>comply</b> (1)	<b>correct</b> (101)	<b>deal</b> (15)	<b>Diadamo</b> (13)
<b>comprehensive</b> (1)	<b>corrected</b> (1)	<b>dealt</b> (2)	<b>difference</b> (8)
<b>computer</b> (3)	<b>correction</b> (1)	<b>December</b> (10)	<b>different</b> (15)
<b>concern</b> (2)	<b>correspondence</b> (1)	<b>decide</b> (4)	<b>difficult</b> (5)
<b>concerned</b> (3)	<b>cost</b> (1)	<b>decided</b> (10)	<b>difficulties</b> (1)
<b>concerning</b> (8)	<b>costs</b> (2)	<b>decipher</b> (1)	<b>difficulty</b> (3)
<b>concerns</b> (3)	<b>counsel</b> (15)	<b>decision</b> (4)	<b>digital</b> (4)
<b>concluded</b> (1)	<b>counterclaim</b> (12)	<b>decisions</b> (2)	<b>diligence</b> (2)
<b>conclusion</b> (5)	<b>counterclaims</b> (1)	<b>declare</b> (1)	<b>direct</b> (2)
<b>conference</b> (22)	<b>countries</b> (1)	<b>deem</b> (1)	<b>directed</b> (1)
<b>conferences</b> (2)	<b>country</b> (1)	<b>deeply</b> (2)	<b>direction</b> (2)
<b>confident</b> (2)	<b>COUNTY</b> (4)	<b>defend</b> (1)	<b>directly</b> (4)
<b>confirmed</b> (1)	<b>couple</b> (2)	<b>defendant</b> (1)	<b>directors</b> (1)
<b>confirming</b> (1)	<b>course</b> (2)	<b>Defendants</b> (2)	<b>disagree</b> (6)

disagreed (2)  
disagrees (1)  
disclosed (5)  
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discovered (3)  
discovery (2)  
discuss (3)  
discussed (8)  
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discussion (17)  
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dismissal (1)  
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dispute (3)  
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distinctly (1)  
DISTRICT (2)  
Docs (1)  
doctor (2)  
document (2)  
documentation (4)  
Documents (23)  
doing (14)  
dollar (2)  
dollars (2)  
double-check (2)  
doubt (1)  
doubts (2)  
downloaded (2)  
draw (1)  
drinking (1)  
dual (1)  
dubious (2)  
due (3)  
duly (2)  
duped (1)  
duplicity (1)  
duties (3)

## &lt; E &gt;

earlier (5)  
early (2)  
easily (2)  
easy (3)  
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editing (1)  
edits (1)  
educated (1)  
efficiently (1)

eight (1)  
either (4)  
elaborate (1)  
elicit (1)  
email (25)  
emailed (4)  
emails (18)  
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encountered (1)  
encourage (3)  
encouraged (4)  
ended (1)  
energy (1)  
enforcement (5)  
engage (2)  
engaged (1)  
Enjoy (1)  
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equate (1)  
erase (1)  
ERIC (3)  
escaping (1)  
especially (2)  
ESQ (2)  
essentially (3)  
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et (2)  
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ethically (1)  
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European (2)  
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exactly (7)  
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example (7)  
Exchange (3)

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Excuse (1)  
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Exhibit (8)  
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expertise (3)  
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explore (2)  
express (3)  
expressed (4)  
expressly (1)  
extent (3)  
extra (1)  
extremely (3)

## &lt; F &gt;

facilitate (1)  
fact (14)  
facts (2)  
Fahy (7)  
F-A-H-Y (1)  
failed (1)  
fair (4)  
fairly (2)  
faith (1)  
fallen (1)  
false (4)  
familiar (3)  
family (4)  
far (11)  
Farkas (6)  
fast (2)  
father (2)  
fault (2)  
favorite (1)  
FBI (55)  
fears (1)

February (3)  
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five-minute (1)  
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flailing (1)  
flashy (1)  
flaws (1)  
flights (1)  
Florida (1)  
flow (1)  
focus (1)  
focused (1)  
follow (1)  
following (2)  
follows (1)  
follow-up (2)  
force (1)  
foregoing (1)

<b>foremost</b> (1)	<b>glossed</b> (2)	<b>hearing</b> (3)	<b>ignore</b> (1)
<b>forgotten</b> (1)	<b>Gmail</b> (2)	<b>heavy</b> (1)	<b>Igor</b> (4)
<b>form</b> (33)	<b>go</b> (59)	<b>he'd</b> (1)	<b>illegal</b> (3)
<b>format</b> (1)	<b>goal</b> (2)	<b>heed</b> (1)	<b>image</b> (1)
<b>formed</b> (6)	<b>goals</b> (1)	<b>held</b> (5)	<b>imagine</b> (1)
<b>former</b> (2)	<b>goes</b> (3)	<b>help</b> (12)	<b>immediately</b> (1)
<b>forms</b> (6)	<b>going</b> (77)	<b>helping</b> (1)	<b>implemented</b> (1)
<b>forward</b> (11)	<b>Good</b> (14)	<b>hesitant</b> (1)	<b>implication</b> (1)
<b>forwarded</b> (2)	<b>Google</b> (1)	<b>high</b> (1)	<b>implied</b> (3)
<b>Foteh</b> (1)	<b>Googled</b> (1)	<b>hired</b> (1)	<b>important</b> (4)
<b>found</b> (8)	<b>Gordon</b> (1)	<b>Hoff</b> (8)	<b>impression</b> (4)
<b>FOUNDATION</b> (9)	<b>Gosh</b> (2)	<b>Hoff's</b> (1)	<b>improperly</b> (1)
<b>four</b> (4)	<b>gotten</b> (4)	<b>hold</b> (1)	<b>include</b> (3)
<b>fraud</b> (3)	<b>government</b> (2)	<b>holder</b> (3)	<b>included</b> (3)
<b>fraudulent</b> (1)	<b>governmental</b> (4)	<b>holders</b> (9)	<b>includes</b> (1)
<b>freely</b> (1)	<b>governments</b> (1)	<b>holding</b> (1)	<b>including</b> (6)
<b>freeze</b> (1)	<b>Grand</b> (1)	<b>home</b> (4)	<b>income</b> (6)
<b>Friday</b> (3)	<b>graphic</b> (4)	<b>homemaker</b> (1)	<b>incomplete</b> (1)
<b>friend</b> (3)	<b>graphics</b> (4)	<b>home-schooled</b> (1)	<b>incorporated</b> (1)
<b>friends</b> (10)	<b>grateful</b> (1)	<b>Hone</b> (2)	<b>incorrect</b> (3)
<b>front</b> (1)	<b>grave</b> (1)	<b>honest</b> (8)	<b>incorrectly</b> (1)
<b>fruition</b> (1)	<b>great</b> (5)	<b>honestly</b> (2)	<b>increase</b> (2)
<b>frustrated</b> (1)	<b>grew</b> (1)	<b>hop</b> (1)	<b>independent</b> (4)
<b>fulfilling</b> (1)	<b>Grossman</b> (1)	<b>hope</b> (4)	<b>INDEX</b> (1)
<b>functioned</b> (1)	<b>ground</b> (2)	<b>hoped</b> (2)	<b>individually</b> (2)
<b>functions</b> (1)	<b>group</b> (4)	<b>hopefully</b> (1)	<b>individuals</b> (1)
<b>fund</b> (1)	<b>grow</b> (1)	<b>hoping</b> (2)	<b>infant</b> (1)
<b>fundamental</b> (1)	<b>guarantee</b> (3)	<b>Horn</b> (7)	<b>inferred</b> (1)
<b>funds</b> (2)	<b>guaranteed</b> (4)	<b>H-O-R-N</b> (1)	<b>inferring</b> (1)
<b>funny</b> (1)	<b>guess</b> (3)	<b>hospital</b> (1)	<b>infomercial</b> (1)
<b>further</b> (4)	<b>guy</b> (2)	<b>housekeeping</b> (1)	<b>inform</b> (5)
<b>future</b> (2)		<b>housewife</b> (7)	<b>information</b> (20)
	<b>&lt; H &gt;</b>	<b>housework</b> (1)	<b>informed</b> (19)
<b>&lt; G &gt;</b>	<b>Hafeeler</b> (1)	<b>HR</b> (1)	<b>informing</b> (2)
<b>Garman</b> (1)	<b>half</b> (1)	<b>huh-uh,</b> (1)	<b>initial</b> (5)
<b>gather</b> (2)	<b>hand</b> (2)	<b>hundred</b> (1)	<b>initially</b> (2)
<b>gathering</b> (2)	<b>handwritten</b> (1)	<b>hundred-million</b>	<b>initiated</b> (2)
<b>general</b> (3)	<b>Hang</b> (5)	<b>(1)</b>	<b>in-laws</b> (2)
<b>generally</b> (2)	<b>hanging</b> (1)	<b>hunt</b> (1)	<b>input</b> (1)
<b>generate</b> (1)	<b>happen</b> (3)	<b>husband</b> (46)	<b>inquire</b> (1)
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<b>gist</b> (1)	<b>harming</b> (1)	<b>ICO</b> (1)	<b>insurance</b> (1)
<b>give</b> (26)	<b>hate</b> (1)	<b>ID</b> (2)	<b>intellectual</b> (1)
<b>given</b> (23)	<b>head</b> (5)	<b>idea</b> (18)	<b>intended</b> (1)
<b>giving</b> (6)	<b>hear</b> (1)	<b>identification</b> (1)	<b>intent</b> (1)
<b>glad</b> (1)	<b>heard</b> (7)	<b>identify</b> (3)	<b>intention</b> (2)

<b>interaction</b> (1)	<b>jeopardize</b> (2)	<b>leave</b> (2)	<b>looked</b> (3)
<b>interest</b> (12)	<b>Job</b> (10)	<b>leaving</b> (2)	<b>looking</b> (10)
<b>interested</b> (2)	<b>JODOIN</b> (25)	<b>led</b> (1)	<b>losing</b> (1)
<b>interests</b> (1)	<b>Jodoins</b> (1)	<b>LeFevres</b> (2)	<b>lost</b> (4)
<b>Interim</b> (5)	<b>John</b> (11)	<b>left</b> (11)	<b>lot</b> (4)
<b>Internal</b> (1)	<b>join</b> (4)	<b>legacy</b> (2)	<b>Louisa</b> (1)
<b>internally</b> (2)	<b>judgment</b> (1)	<b>legal</b> (15)	<b>love</b> (2)
<b>international</b> (1)	<b>July</b> (2)	<b>legality</b> (3)	<b>lower</b> (1)
<b>interpose</b> (1)	<b>jump</b> (1)	<b>legally</b> (6)	<b>Lykke</b> (1)
<b>interposed</b> (1)	<b>June</b> (5)	<b>lengthy</b> (2)	< M >
<b>interrogated</b> (1)	<b>junk</b> (1)	<b>letter</b> (9)	<b>Madam</b> (1)
<b>interrogatories</b> (9)	<b>jurisdiction</b> (1)	<b>liability</b> (5)	<b>maiden</b> (2)
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<b>interview</b> (8)	<b>Kathy</b> (1)	<b>liaison</b> (1)	<b>majority</b> (2)
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<b>introduce</b> (2)	<b>Kent</b> (1)	<b>lied</b> (3)	<b>man</b> (2)
<b>introduced</b> (4)	<b>kids</b> (3)	<b>life</b> (3)	<b>management</b> (1)
<b>introducing</b> (1)	<b>Kim</b> (2)	<b>light</b> (1)	<b>Marc</b> (9)
<b>invest</b> (1)	<b>Kimberly</b> (5)	<b>liked</b> (1)	<b>March</b> (12)
<b>investigated</b> (1)	<b>kind</b> (17)	<b>limited</b> (3)	<b>Marco</b> (17)
<b>investigating</b> (5)	<b>kinds</b> (1)	<b>line</b> (2)	<b>Marco's</b> (1)
<b>investigation</b> (3)	<b>KNECHT</b> (42)	<b>lines</b> (1)	<b>Marc's</b> (1)
<b>investigative</b> (1)	<b>knew</b> (31)	<b>lingering</b> (1)	<b>Marcus</b> (149)
<b>investigator</b> (1)	<b>know</b> (115)	<b>LinkedIn</b> (1)	<b>Marcus'</b> (1)
<b>investment</b> (26)	<b>knowledge</b> (8)	<b>Lisa</b> (4)	<b>margins</b> (1)
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<b>investor</b> (3)	<b>knows</b> (1)	<b>listed</b> (4)	<b>market</b> (17)
<b>investors</b> (9)	< L >	<b>listen</b> (1)	<b>marketing</b> (9)
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<b>invitations</b> (2)	<b>lack</b> (2)	<b>listening</b> (3)	<b>material</b> (1)
<b>invite</b> (1)	<b>language</b> (1)	<b>litigation</b> (6)	<b>materials</b> (2)
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<b>involved</b> (16)	<b>largest</b> (2)	<b>lived</b> (3)	<b>Mawhinney</b> (37)
<b>IP</b> (2)	<b>Las</b> (19)	<b>lives</b> (1)	<b>Mawhinney's</b> (2)
<b>IPO</b> (37)	<b>late</b> (2)	<b>living</b> (1)	<b>McGonigal</b> (1)
<b>IPP</b> (1)	<b>launched</b> (1)	<b>LLC</b> (2)	<b>mean</b> (14)
<b>Ireland</b> (1)	<b>laundering</b> (3)	<b>LLP</b> (1)	<b>meaning</b> (1)
<b>issue</b> (3)	<b>law</b> (16)	<b>lobbyist</b> (4)	<b>means</b> (1)
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<b>issues</b> (9)	<b>lawsuit</b> (2)	<b>located</b> (1)	<b>meet</b> (3)
<b>its</b> (1)	<b>lawyer</b> (19)	<b>lock</b> (1)	<b>meeting</b> (19)
< J >	<b>lawyers</b> (4)	<b>locked</b> (5)	<b>meetings</b> (1)
<b>Jack</b> (2)	<b>lawyer's</b> (4)	<b>lockout</b> (1)	<b>Melissa</b> (1)
<b>James</b> (26)	<b>layout</b> (1)	<b>login</b> (1)	<b>member</b> (1)
<b>January</b> (16)	<b>leading</b> (1)	<b>London</b> (12)	<b>members</b> (3)
<b>Jarek</b> (7)	<b>leads</b> (2)	<b>long</b> (2)	<b>membership</b> (3)
<b>Jason</b> (1)	<b>learned</b> (3)	<b>longer</b> (10)	<b>mentioned</b> (12)
<b>Jeff</b> (1)		<b>long-term</b> (2)	<b>met</b> (9)
		<b>look</b> (20)	



<b>methane</b> (3) <b>middle</b> (1) <b>million</b> (52) <b>million-dollar</b> (1) <b>mind</b> (1) <b>mined</b> (1) <b>minute</b> (1) <b>minutes</b> (4) <b>misled</b> (2) <b>mismanaging</b> (1) <b>misrepresented</b> (1) <b>missing</b> (6) <b>mistakes</b> (1) <b>misunderstanding</b> (1) <b>model</b> (1) <b>modify</b> (1) <b>mom</b> (1) <b>monetary</b> (1) <b>money</b> (44) <b>Montecito</b> (1) <b>month</b> (3) <b>months</b> (5) <b>moral</b> (1) <b>morally</b> (2) <b>move</b> (5) <b>moved</b> (1) <b>multiple</b> (1) <b>Murray</b> (1) <b>Musiitwa</b> (1) <b>mute</b> (1)  <b>&lt; N &gt;</b> <b>NAC</b> (78) <b>NAC's</b> (1) <b>Naimer</b> (1) <b>name</b> (27) <b>named</b> (4) <b>names</b> (5) <b>near</b> (1) <b>necessarily</b> (2) <b>necessary</b> (2) <b>need</b> (12) <b>needed</b> (17) <b>needs</b> (1) <b>negotiate</b> (1) <b>negotiating</b> (2) <b>negotiations</b> (2) <b>NEVADA</b> (10) <b>never</b> (41)	<b>new</b> (11) <b>new-co</b> (2) <b>news</b> (1) <b>night</b> (1) <b>nodding</b> (1) <b>non-live</b> (1) <b>note</b> (2) <b>notes</b> (4) <b>noticing</b> (1) <b>November</b> (12) <b>number</b> (36) <b>numbers</b> (7) <b>numerous</b> (5)  <b>&lt; O &gt;</b> <b>oath</b> (3) <b>object</b> (2) <b>objection</b> (38) <b>objections</b> (1) <b>obligated</b> (1) <b>obligation</b> (6) <b>obtain</b> (1) <b>obviously</b> (1) <b>occur</b> (2) <b>occurred</b> (4) <b>October</b> (4) <b>odd</b> (1) <b>offer</b> (6) <b>offered</b> (5) <b>offering</b> (10) <b>office</b> (31) <b>officer</b> (22) <b>officers</b> (4) <b>official</b> (1) <b>officially</b> (1) <b>off-putting</b> (1) <b>Oh</b> (4) <b>oil</b> (1) <b>Okay</b> (113) <b>okayed</b> (1) <b>old</b> (2) <b>OLSEN</b> (57) <b>once</b> (19) <b>ones</b> (2) <b>ongoing</b> (1) <b>online</b> (1) <b>operating</b> (3) <b>operation</b> (1) <b>operations</b> (1) <b>opinion</b> (30)	<b>opinions</b> (2) <b>opportunity</b> (8) <b>opposed</b> (3) <b>oral</b> (2) <b>order</b> (4) <b>ordered</b> (1) <b>orders</b> (1) <b>organize</b> (1) <b>organized</b> (1) <b>organizing</b> (2) <b>original</b> (3) <b>originally</b> (4) <b>Ortmeier</b> (2) <b>O-R-T-M-E-I-E-R</b> (1) <b>out-of-pocket</b> (1) <b>outside</b> (1) <b>over-evaluated</b> (1) <b>over-evaluating</b> (1) <b>overheard</b> (2) <b>overly</b> (1) <b>oversee</b> (3) <b>overseeing</b> (3) <b>oversight</b> (2) <b>overstating</b> (1) <b>owned</b> (2) <b>owner</b> (3)  <b>&lt; P &gt;</b> <b>p.m</b> (6) <b>package</b> (1) <b>packaging</b> (1) <b>Packet</b> (3) <b>Page</b> (16) <b>pages</b> (1) <b>paid</b> (6) <b>paper</b> (5) <b>papers</b> (1) <b>paperwork</b> (10) <b>paragraph</b> (2) <b>parameters</b> (1) <b>paraphrase</b> (1) <b>paraphrasing</b> (1) <b>Pardon</b> (10) <b>parents</b> (2) <b>Parkway</b> (1) <b>part</b> (24) <b>parted</b> (1) <b>participant</b> (1) <b>participate</b> (2)	<b>participating</b> (1) <b>particular</b> (4) <b>Particularly</b> (3) <b>parties</b> (4) <b>partner</b> (1) <b>partners</b> (2) <b>parts</b> (4) <b>party</b> (1) <b>pass</b> (2) <b>patents</b> (5) <b>Patti</b> (2) <b>pay</b> (8) <b>paying</b> (1) <b>payment</b> (4) <b>penalty</b> (1) <b>people</b> (40) <b>percent</b> (1) <b>percentage</b> (4) <b>perdiems</b> (1) <b>perform</b> (1) <b>period</b> (1) <b>perjury</b> (1) <b>permanent</b> (1) <b>permission</b> (2) <b>person</b> (24) <b>personal</b> (9) <b>personally</b> (6) <b>persons</b> (1) <b>person's</b> (2) <b>perspective</b> (1) <b>phone</b> (12) <b>phonetic</b> (2) <b>pick</b> (2) <b>picking</b> (1) <b>piece</b> (2) <b>piecemeal</b> (1) <b>pigs</b> (1) <b>place</b> (4) <b>placed</b> (2) <b>places</b> (1) <b>Plaintiff</b> (3) <b>Plaintiffs</b> (1) <b>plan</b> (18) <b>planning</b> (1) <b>pleadings</b> (1) <b>please</b> (13) <b>plus</b> (1) <b>point</b> (48) <b>points</b> (1) <b>Poland</b> (9)
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sneeze (1)  
software (1)  
sold (4)  
sole (1)  
solicit (1)  
soliciting (1)  
somebody (16)  
somebody's (1)  
son's (1)  
soon (2)  
sorry (14)  
sort (6)  
sound (2)  
Sounds (2)  
sources (1)  
south (2)  
speak (4)  
speaker (1)  
speaking (3)  
speaks (1)  
special (1)  
specific (8)  
specifically (5)  
specified (1)  
speculation (2)  
speed (1)  
spelling (2)  
spoke (7)  
spoken (3)  
sponsor (1)  
sponsored (1)  
ss (1)

staff (1)  
stage (3)  
stand (1)  
standard (1)  
stands (1)  
start (4)  
started (6)  
starting (1)  
starts (1)  
State (12)  
stated (3)  
statement (11)  
statements (4)  
States (4)  
stating (4)  
status (1)  
stay (2)  
staying (1)  
steady (1)  
**STENOGRAPHER**  
(4)  
stenographic (3)  
step (1)  
stepped (1)  
steps (1)  
stock (7)  
stop (1)  
stopped (4)  
story (3)  
straight (1)  
strategy (1)  
streamlined (1)  
Street (1)  
strike (2)  
struck (1)  
structure (14)  
structured (4)  
struggling (1)  
stuck (1)  
stuff (5)  
stumbled (1)  
subject (1)  
submission (1)  
submitting (3)  
subsequent (3)  
subsequently (1)  
substantial (1)  
success (1)  
successful (1)  
successfully (1)

sue (3)  
sued (1)  
suggest (2)  
suggested (2)  
suggesting (1)  
suggestion (1)  
suggests (1)  
suing (1)  
Suite (2)  
summary (1)  
supplement (1)  
supplemental (3)  
support (1)  
supposed (10)  
sure (27)  
surprise (8)  
surprised (1)  
surrender (1)  
suspicions (2)  
sustain (1)  
switch (3)  
sworn (2)

## &lt; T &gt;

take (28)  
Taken (8)  
talk (12)  
talked (21)  
talking (16)  
talks (2)  
task (2)  
tasked (1)  
tax (3)  
taxes (6)  
Taylor (3)  
team (11)  
technical (2)  
technically (1)  
technology (1)  
tell (44)  
telling (7)  
tells (2)  
Terence (3)  
Terence's (1)  
term (11)  
terminated (1)  
terms (2)  
terrorist (1)  
Tesser (2)  
testified (2)

testify (1)  
testimony (3)  
texted (1)  
Thank (3)  
Thanks (2)  
theft (1)  
theft-proof (2)  
theirs (1)  
thing (22)  
things (18)  
think (35)  
thinking (8)  
third (2)  
thought (10)  
three (7)  
thrown (1)  
thumbnail (2)  
tight (2)  
time (46)  
timeline (1)  
times (9)  
timing (1)  
tiny (1)  
tip (1)  
Tippett (1)  
title (4)  
titles (1)  
today (7)  
Today's (1)  
token (8)  
tokens (18)  
told (94)  
topic (1)  
total (1)  
totally (1)  
touch (5)  
tough (1)  
trade (1)  
traded (1)  
trading (1)  
transactions (1)  
transcribed (1)  
transcript (4)  
transcription (2)  
transfer (2)  
transform (2)  
transmission (1)  
traveling (3)  
Trenching (1)  
trial (1)

tried (4)  
trip (4)  
trouble (3)  
true (7)  
truly (4)  
trust (1)  
trusted (2)  
trustworthy (1)  
truth (6)  
truthful (1)  
truthfully (1)  
try (7)  
trying (19)  
turn (3)  
turned (3)  
Turner (1)  
twice (2)  
twins (1)  
two (12)  
Tyler (13)  
type (10)  
types (1)  
typewritten (1)  
typical (1)  
typically (2)

## &lt; U &gt;

U.S (2)  
Uh-huh (1)  
UK (4)  
Ukraine (1)  
ultimate (1)  
ultimately (1)  
Um-hum (6)  
unbanked (1)  
uncomfortable (2)  
understand (39)  
understanding (3)  
understood (13)  
unethical (1)  
unhappy (1)  
United (4)  
unlawful (2)  
unlicensed (1)  
unnecessary (2)  
unregistered (2)  
unsecured (1)  
unsuccessful (1)  
untraded (1)  
upcoming (1)

updates (1)  
updating (1)  
upset (1)  
use (6)  
  
< V >  
vaguely (1)  
valuation (37)  
valuations (1)  
value (19)  
valued (3)  
values (2)  
variety (1)  
various (11)  
vastly (1)  
Vegas (19)  
venture (2)  
venue (2)  
venued (1)  
verbal (3)  
verbally (2)  
verification (3)  
version (3)  
versus (2)  
vet (1)  
viable (2)  
video (4)  
VIDEOCONFERENCE (2)  
Vietnam (1)  
view (4)  
view-back (1)  
viewers (1)  
Vince (3)  
violated (2)  
violating (1)  
violation (12)  
visit (3)  
volunteer (1)  
voting (1)  
VP (1)  
vs (1)

## &lt; W &gt;

wait (5)  
waiting (2)  
wake-up (2)  
walked (3)  
wallet (6)  
want (27)

wanted (15)  
wanting (3)  
wants (1)  
Warsaw (3)  
watch (1)  
way (22)  
ways (2)  
web (2)  
webmail (1)  
website (11)  
week (2)  
weekend (1)  
W-E-I-N-E-R (1)  
Weir (3)  
welcoming (1)  
Well (55)  
well-known (1)  
went (32)  
we're (21)  
We've (2)  
WHEREOF (1)  
whichever (1)  
whole-heartedly (1)  
wife (1)  
willing (2)  
Wincura (13)  
wine (3)  
wire (1)  
wish (1)  
withdraw (1)  
withdrew (1)  
witness (21)  
woman (1)  
won (1)  
wonderful (1)  
word (3)  
worded (1)  
words (2)  
work (22)  
worked (5)  
worker (2)  
workers (1)  
working (22)  
work-work (1)  
world (1)  
worth (16)  
wrap (1)  
write (2)  
writing (6)  
written (9)

wrong (11)  
wrongdoing (1)  
wrote (8)  
Wynar (3)  
W-Y-N-A-R (1)  
  
< X >  
XIV (1)  
  
< Y >  
Yeah (12)  
year (3)  
years (7)  
Yep (4)  
York (1)  
  
< Z >  
Zoom (1)